



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Sustainable Biomass Program Limited
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Delivered by e-mail to: RRA@sbp-cert.org

December 4, 2024

Re: AWA Feedback on the Draft Regional Risk Assessment (RRA) for Alberta

Dear Sustainable Biomass Program (SBP) Secretariat,

Alberta Wilderness Association (AWA) is writing you to provide feedback on the Draft Regional Risk Assessment (hereafter "RRA") for the province of Alberta, Canada, as part of the public consultation process which closes on December 6, 2024.

SBP endorsed RRAs are used to identify, confirm, and mitigate risks associated with sustainably and legally sourcing feedstock of biomass pellet and wood chip production. The intent of this public consultation is to solicit additional feedback which may be incorporated into the RRA.

AWA is the oldest Alberta-based environmental conservation group with more than 7,500 members and supporters in Alberta and around the world. AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters, and biodiversity to ensure future generations enjoy the abundant benefits they provide.

Our concerns with the RRA are summarized in the list below and outlined in greater detail in the following sections of this letter.

Summary of concerns:

1. Inadequate Regional Planning – RRA Indicator(s) 2.1.3 and 4.2.4
2. Fraudulent Forest Certifications – RRA Indicator 1.1.1
3. Woodland Caribou Concerns – RRA Indicator 2.1.3
4. Stakeholder Concerns

1. Inadequate Regional Planning

Regarding RRA Indicator 2.1.3 – "Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the supply base shall be maintained or enhanced."

And RRA Indicator 4.2.4 – "Legal, customary, and traditional tenure and use rights of indigenous people and local communities related to the supply base shall be identified, documented, and respected."

In Alberta, regional land-use plans are one of the primary mechanisms used to manage human disturbance across the landscape. Regional plans are supposed to divide a region into areas where

development can occur, areas with limited human activities, and areas that are set aside for environmental protection and conservation. Regional plans are intended to plan out economic, environmental, and social objectives in a way that minimizes the cumulative impacts of human activities.

The majority of Alberta's forests are located within the boreal forest natural region, covering roughly 58 percent of the province, which is acknowledged in the RRA. The boreal region is predominantly shared across four land-use planning regions, which are the: 1) Upper Athabasca, 2) Lower Athabasca, 3) Upper Peace, and 4) Lower Peace regions.

However, as of December 2024, no regional plans have been developed and/or implemented for three of the four regions listed above (i.e., Upper Athabasca, Upper Peace, and Lower Peace). This means that there is no regional land use plan in place to properly plan and/or manage the cumulative impacts of human activities within those three regions.

With respect to the Lower Athabasca Regional Plan (LARP), Alberta's regional planning process allows for individuals or groups who are directly and adversely affected to request a review of a land-use plan. In 2015 a report was published by a review panel which was commissioned on behalf of six directly and adversely affected First Nations in the Lower Athabasca Region: Athabasca Chipewyan First Nation, Mikisew Cree First Nation, Cold Lake First Nation, Fort McKay First Nation, Fort McKay Metis Community Association, and Chipewyan Prairie Dene First Nation.

The primary findings of the 2015 LARP Review Panel Report highlighted that the cumulative effects of rapid industrial development in the lower Athabasca region were negatively impacting First Nations, and that the Government of Alberta did not adequately address the arguments put forward by First Nations, or the written evidence they provided. The Review Panel Report found that the interest of First nations were not incorporated into LARP in any meaningful way. Cumulative effects of industrial development in the lower Athabasca region were found to be negatively impacting the Constitutional Rights of First Nations and their traditional land uses.¹

Given that three of four regional plans intended to manage human activities across the boreal region are incomplete; and given that the only completed regional plan (i.e., LARP) has been heavily criticized for allowing cumulative impacts to negatively impact Indigenous Rights, then the SBP should not consider any forestry activities within the boreal to be sustainable. This includes any/all biomass feedstock attained through forestry activities conducted in Alberta's boreal region.

2. Fraudulent Forest Certifications

Regarding Indicator 1.1.1 – “Operations related to feedstock sourcing and biomass production shall comply with all applicable and existing laws and regulations.”

¹ LARP Review Panel, “Review Panel Report 2015: Lower Athabasca Regional Plan,” June 22, 2015, <https://open.alberta.ca/dataset/5c910acf-9e8c-46b5-b52d-60fc8bd2bbbd/resource/d9a6bff5-f9b5-45fe-81ed-a8de3492e271/download/2016-review-panel-report-2015-lower-athabasca-regional-plan-2016-06-22.pdf>.

Forest certifications are intended to identify forests that are managed in a way that meets agreed-upon standards, and to label products originating from those forests to promote sustainable forestry practices.

According to the RRA, 46 percent (16655912 of 36182600 ha) of the supply base has been certified under the Sustainable Forestry Initiative (SFI) certification scheme.

SFI is North America's largest forest certification system and is backed by the logging industry. SFI gives the impression that logging operations certified to the SFI standard are sustainable while having no rules requiring that logging meet prescribed sustainability criteria nor any on-the-ground assessment to confirm sustainability.

SFI has long faced criticism from environmental and community groups in both Canada and the United States including an ongoing investigation being conducted by Canada's Competition Bureau which was triggered by a complaint filed by Ecojustice on behalf of several environmental organizations – including AWA – back in November 2022.

Considered in the context of an internationally accepted definition of sustainable forest management, the groups say SFI is misrepresenting the standards of its certification system, and that this has contributed and will continue to contribute to unsustainable logging globally and in Canada on an immense scale. SFI's certification allows clearcutting, spraying of toxic chemicals, and logging of endangered forests (including old growth forests and caribou habitat).²

In Canada, the *Competition Act* makes it illegal for organizations to make false or misleading claims that deceive the public about the products or services they offer. If the inquiry by the Competition Bureau finds that SFI has misled the public, it may require SFI to not only remove all sustainability claims from its public communications about the SFI standard, and from the name of the program itself, but to also publicly retract its sustainability claims and moreover, pay a fine of up to \$10 million directed towards conservation projects.

Given these concerns, AWA believes that no biomass feedstock production can be considered sustainable if it is produced from wood that has been harvested in SFI certified forests. In addition, AWA recommends that the SBP consider removing SFI from the list of forest certifications within its RRA criteria for future assessments.

3. Woodland Caribou Concerns

Regarding RRA Indicator 2.1.3 – “Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the supply base shall be maintained or enhanced.”

Woodland caribou (*Rangifer tarandus caribou*) were listed as threatened under Schedule 1 of Canada's *Species at Risk Act* (SARA) in 2003. The purpose of SARA is to prevent wildlife species from becoming extinct or extirpated, and to help in the recovery of extirpated, endangered, or threatened species.

² Ecojustice, “Application for Inquiry: False and Misleading Representations by the Sustainable Forest Initiative about Their Forest Certification Standard,” November 2022, <https://ecojustice.ca/wp-content/uploads/2022/12/SFI-CB-Complaint-Final.pdf>.

Environment Canada published its recovery strategy for boreal woodland caribou in 2012. According to the recovery strategy, critical habitat for boreal caribou is identified as: “i) the area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65% of the area as undisturbed habitat; and ii) biophysical attributes required by boreal caribou to carry out life processes.”³

This means that caribou populations require a minimum of 65 percent of the habitat within their range to be undisturbed to have a 60 percent chance of becoming self-sustaining. The Government of Alberta’s process to achieve the 65 percent undisturbed critical habitat threshold for caribou is the sub-regional planning process. However, as of December 2024, only two of 11 sub-regional plans have been completed, and none have been implemented.

According to Government of Alberta data published in May 2024, the percentage of caribou range covered by human footprint increased in all ranges (except for two summer ranges), six ranges now have less than 10 percent undisturbed habitat remaining, and Alberta continues to approve new disturbances within (or adjacent to) caribou ranges.⁴

The recovery strategy identifies threats to caribou recovery, which includes habitat alteration (loss, degradation or fragmentation) as a result of human land-use activities such as forestry. In addition, the recovery strategy includes forestry cut blocks as an example of activities likely to result in the destruction of critical habitat.

Given the precarious state of woodland caribou populations in Alberta, and the significant risk posed to caribou recovery by human disturbances such as forestry, AWA believes that no biomass feedstock production should receive SBP certification unless SBP can confirm that the timber used did not come within (or adjacent to) caribou ranges.

4. Stakeholder Concerns

AWA is concerned with the lack of transparency in the List of Stakeholders provided in Annex 4 of the RRA. Annex 4 only includes the eight broad categories of stakeholder (i.e., economic interests, environmental interests, etc.) who were consulted with in the development of the RRA, but the RRA does not list who the specific stakeholders were, who they represent, and in what proportion various interest groups were represented. To ensure that the RRA development process was unbiased, there should have been equal representation between all eight stakeholder categories to avoid over-weighting feedback from a particular interest group.

AWA also has concerns regarding the inclusion of a representative from the Alberta Forest Products Association (AFPA) in the list of experts consulted (Annex 2). AFPA is a non-profit that represents the Alberta Forestry Industry and uses its position to lobby Alberta’s provincial government to the benefit of industry. For example, an AFPA report from 2020 was provided to Alberta’s former Minister of Agriculture provided recommendations on how to increase wood supply from Crown

³ Environment Canada, “Recovery Strategy for the Woodland Caribou (*Rangifer Tarandus Caribou*), Boreal Population in Canada” (Ottawa, 2012).

⁴ Government of Alberta, “Report on the Implementation of the Section 11 Agreement for the Conservation and Recovery of the Woodland Caribou in Alberta: 2022-2023,” May 21, 2024.

land, including an increase to annual allowable cuts, logging in protected areas, and intensifying forest management.

In addition, there seems to be limited consideration for Indigenous inherent, Constitutional, and/or Treaty Rights within the development of the RRA. No Indigenous Community representatives are included in the list of experts consulted (Annex 2), and no Indigenous interests are included in the list of stakeholders (Annex 4).

Concluding Remarks

Due to the environmental risks and concerns listed above, AWA encourages SBP to reconsider whether biomass feedstock sourced from the supply base in Alberta can and/or should be certified as sustainable.

Alberta's lack of land-use planning, the prevalence of SFI certifications, potential impacts to at-risk woodland caribou, and potential impacts to Indigenous Rights should be more than enough evidence against any claims about sustainable biomass feedstock production in Alberta.

AWA is grateful for the opportunity to provide feedback as part of this public consultation process, and we hope to see our comments and recommendations considered in the final version of SBP's RRA for Alberta.

If you have any questions or concerns about the feedback included in this letter, please don't hesitate to get in touch with AWA directly by email or by phone.

Sincerely,
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