



## Western Forest Products

**Logging Practices &  
The Forest Stewardship  
Council's Principles  
& Criteria:**

**An Indicative  
Assessment**

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*Front Cover*  
1997 logging by Western Forest  
Products on Roderick Island.  
Clearcutting is planned to be used  
for over 90% of the cutblocks  
Western Forest Products plans to  
conduct in the next few years.  
(McAllister)

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### Abbreviations:

<b>FSC</b>	Forest Stewardship Council
<b>WFP</b>	Western Forest Products
<b>CSSP</b>	Clayoquot Sound Science Panel
<b>BC</b>	British Columbia, Canada
<b>AAC</b>	Annual allowable cut
<b>FDP</b>	Five-year development plan
<b>SP</b>	Silvicultural prescriptions
<b>P&amp;C</b>	Principles and criteria

## EXECUTIVE SUMMARY

Western Forest Products (WFP) recently announced that they would have their operations audited under the Forest Stewardship Council (FSC) certification and labeling system to demonstrate to their customers and the public that their forestry practices adhere to acceptable standards.

The FSC is a non-profit, non-governmental organization which has been set up to support environmentally sound, socially beneficial and economically viable forestry management, and the labeling and marketing of forest products from such forests. The FSC system is based on audits conducted by professional auditors against stringent, internationally recognized standards.

WFP has widely promoted the fact that it is going through an FSC audit to its customers, the forest industry, press and the Canadian public. However, an FSC audit is not a guarantee that a certificate will be issued. A number of serious and persistent issues have been documented and raised by scientists, environmentalists, aboriginal peoples, consumers and the public about the environmental and social impacts of WFP's operations.

This indicative assessment studies WFP's current and planned forestry practices against the Forest Stewardship Council's Principles and Criteria (FSC P&C) to identify compliance gaps. For each of the FSC P&C, we assessed WFP performance and then rated it as either a) compliance b) non-compliance c) serious non-compliance and d) insufficient information available to assess.

Of the 52 individual FSC Criteria, insufficient information was available to assess 20 of them. Of the remaining 32 criteria, WFP was in compliance with 6%, in non-compliance with 25% and in serious non-compliance with 69%. Of the criteria we were able to assess, we determined that WFP had an overall failure rate of 94%.

Principle broad areas of WFP serious non-compliance include:

- Failure to adequately conserve primary forests of major environmental, social and cultural significance (FSC Principles 6, 9 and related Criteria);
- Failure to respect the rights of First Nations to own, use and manage their lands, territories and resources (FSC Principles 2, 3 and related Criteria);
- Continued widespread use of intensive logging practices which negatively impact associated biodiversity, ecological functions and forest integrity (FSC Principles 5, 6, 7, 9 and related Criteria);
- Continued use of forest management systems which lead to the degradation and conversion of primary forests to short-rotation tree-farms (basis of FSC Principle 9).

This report finds that WFP is out of step with the latest thinking in BC forestry policy:

Firstly, the Clayoquot Sound Science Panel (CSSP) provides a detailed study on maintaining ecosystem integrity and long-term social and economic needs in coastal temperate rainforests of British Columbia and sets an important benchmark for FSC certification standards for the area. For example, one of the CSSP 120 recommendations was that timber planning be ecosystem-based, rather than volume-driven as is currently practiced by WFP, which would entail "abandoning the specification of Annual Allowable Cut as an input to local planning."

Our assessment finds the CSSP recommendations to be much more consistent with the FSC's guiding Principles and Criteria than WFP's current and planned forestry operations. The assessment concludes that WFP's operations are far from being certifiable under the FSC system without far-reaching and fundamental changes to the company's operations and forest management planning.

Secondly, WFP's position on FSC certification and forest policy compares sharply with the position taken by BC's leading coastal forestry company MacMillan Bloedel, whose recent declaration is a significant shift from traditional BC forest policy. The company intends to phase out clearcutting of coastal primary forests within 5 years and to gradually shift from primary forests towards second-growth forests exploitation within 25 years. In addition, the company states that certification will be applied as an effort to satisfy customers.

These overall findings contrast sharply with WFP's own publicly stated opinions by their Chief Forester, Bill Dumont, who has claimed that WFP current operations are FSC-certifiable without any significant changes to their activities on the ground. For example, on CBC Radio (10 June 1998) he said: "I think that our operations... are going to be recognised and we'll get our [FSC] certification." Similar statements have been by other WFP representatives in recent months, in published literature and to a number of their customers. It is clear that the FSC name is being used to give some 'green' credibility and marketing advantage to WFP.

This assessment concludes that WFP's current and planned operations demonstrate a consistent pattern of broad non-compliance with the Forest Stewardship Council's guiding Principles and Criteria.

## PREAMBLE

SGS Qualifor (SGS) based in Oxford, United Kingdom, has recently been contracted by Western Forest Products Ltd. to conduct a Forest Stewardship Council endorsed certification assessment of all of its forestry operations in British Columbia. SGS has certified 64.3% of the land area of FSC accredited certifications worldwide.

The Forest Stewardship Council (FSC) is a non-profit, non-governmental organization which has been set up to support environmentally sound, socially beneficial and economically viable forest management, and the labeling and marketing of forest products from such forests. The introduction to the FSC's Principles and Criteria for forest management can be found in *Appendix 3* and explains further its goals and functions.

### SGS

**"The SGS International Certification Services group of companies (SGS-ICS) is active in over 60 countries and accredited in 14 countries, SGS-ICS services embrace a wide range of accredited certifications and the related registered training courses.**

**SGS inspection, testing and consulting capabilities and numerous services linked to the production, marketing and sales of consumer goods are available to enable both suppliers and distributors to comply with safety and quality standards and other regulatory requirements.**

**SGS Forestry is the Group's centre of technical excellence in forestry and wood products, specializing in forest management auditing, forest certification (QUALIFOR), log and wood product control systems (Logtrak), due diligence assessments and training. In addition, SGS Forestry provides technical services in fields such as forest management and monitoring, forest product pricing, forest revenue collection system design and forestry research and development. SGS Forestry's international forest management certification program is accredited by the Forest Stewardship Council (FSC)."**

### *The Forest Stewardship Council reasons for formation, and goals (5):*

**"Forest certification emerged in the late '80s in response to perceived poor forestry management and calls for boycotts of certain wood products. Consequently, the Forest Stewardship Council (FSC) was formed to oversee a credible process of independent certification of well-managed forests. The Forest Stewardship Council (FSC) is an international, independent, non-profit, non-governmental organization. In 1993, after three years of extensive international consultation with a broad range of stakeholders, the Forest Stewardship Council (FSC) was founded. Interested parties actively participating in the establishment of the FSC included representatives from environmental institutions, the timber trade, the forestry profession, indigenous peoples' organizations, community forestry groups and forest product certification organizations from 25 countries. This diverse group developed the FSC's Principles and Criteria, which applies to tropical, temperate and boreal forests. They cover broad issues such as land tenure, the reduction of environmental impacts, optimal utilization of forest products, and written management plans. The Principles and Criteria are intended to be used as a guiding framework for developing regional forest stewardship standards which are appropriate to local social, ecological and economic conditions.**

**The FSC is a membership association with more than 200 members from over 37 countries. Membership is open to a wide range of organizations and individuals representing social, economic and environmental interests. Through a voting process that gives equal weight to the economic, social, and environmental chambers, all decisions are made. The voting process is also balanced South-North.**

### *Principles and Criteria*

**After three years of extensive consultation around the world, ten Principles and complementary Criteria were agreed upon at the FSC's founding meeting in Toronto, in 1993. The FSC's Principles and Criteria are universal in nature and apply to tropical, temperate and boreal forests. They cover broad issues such as land tenure, the reduction of environmental impacts, optimal utilization of forest**

products, and written management plans. The Principles and Criteria are intended to be used as a guiding framework for developing standards which are appropriate to social, ecological and economic conditions at national and/or regional levels.

#### ***Regional Forest Stewardship Standards***

The FSC Principles and Criteria require interpretation at the local level. For this reason, the FSC encourages the development of regional forest stewardship standards which are in line with FSC's mission. This structure makes the standards relevant to local circumstances within a set of globally agreed upon Principles and Criteria. The FSC's approach provides a system that is accountable to the interested and affected parties in a region or country because they are the key actors in the development of forest stewardship standards. The standards development process must be equitable and transparent, include representatives from Aboriginal, environmental, economic and social organizations as well as including consultation with the public at large.

Regional forest stewardship standards strengthen the certification process. Certifiers operating within the region must use these standards as the basis for their evaluation. These standards are an important tool in improving transparency and public acceptance of certification in a region. The inclusive and transparent manner in which the FSC operates offers a promising and practical alternative in defining what good forest management is, and in communicating this message effectively to environmentally and socially concerned consumers.”

The FSC accredits certifiers, such as SGS, to conduct independent assessments of logging companies to determine whether they comply with FSC P&C. WFP has contracted SGS to evaluate WFP's forest management against the generic requirements of the FSC P&C, supplemented by regional standards or specific performance criteria, relevant to local ecological, social, and economic circumstances. SGS has informed the FSC BC Drafting Committee that it will be part of the SGS evaluation process. The first draft of the FSC Standards for British Columbia (BC) are expected in late Fall 1998.

SGS is proceeding with assessing WFP's operations. However, there are a number of unresolved issues concerning WFP's operations that will influence whether WFP is able to meet FSC certification standards within the BC context. These include the fact that land use planning processes for much of the coastal temperate rainforest zones where WFP operates are not yet completed. Additionally, the nature of land title and tenure with indigenous peoples and the high level of logging of old growth forests are unresolved issues. Each of these issues holds the potential to set precedents.

The certification assessment process for WFP is planned to follow these steps:

1. *Checklist Development and Stakeholder Consultation;*
2. *Main Assessment by an SGS Quality Forestry (Qualifor) Assessment Team using the checklist;*
3. *Peer review of the assessment results.*

The development of the local checklist will be based on existing local standards and requirements including: relevant government legislation, regulations, guidelines and policy, recognized industry and non-government organization (NGO) guidelines for forest management, environmental protection, social responsibility, and any other relevant criteria.

SGS has convened a group of BC Forest Specialists with experience in forest ecology, forest economics, and in social, environmental, and First Nation issues to develop the draft checklist that is to help determine if WFP operations are certifiable by FSC (see *Appendix 2*, BC Forest Specialists appointed to develop the draft SGS checklist). Interested stakeholders are allowed to provide their views on the checklist and on WFP forest practices under the stakeholder consultation process. Once the stakeholder consultation process is complete and reasonable consensus has been achieved on the local checklist, the Main Assessment of WFP's forest management against these requirements will be undertaken.

The current schedule is:

**Phase 1: Development of local standard checklist and stakeholder consultation**

June 22: *Certification process information circular sent to key stakeholders;*

August: *SGS convened a small technical group of independent BC 'specialists' to produce a draft checklist for the main assessment;*

September 4: *Stakeholder consultation process begins with the circulation of draft checklist to FSC BC Steering Committee and interested stakeholders;*

October 16: *End of stakeholder consultation phase;*

Early November: *Local standard finalized by SGS technical committee.*

**Phase 2: Main Assessment of Western Forest Products operations and further stakeholder consultation**

Exact dates to be determined at completion of Phase 1. A SGS Audit team will assess WFP's operations against the local standard developed under Phase 1, above. Stakeholders are encouraged to submit comments and concerns on Western Forest Products operations. Process planned to be completed by July 1999.

Flexibility is incorporated into the process to allow for unforeseen developments, the anticipated FSC announcement regarding changes to Principle 9, and the release of draft BC standards.

Contact information for SGS and the FSC, including the FSC-Canada BC Steering Committee, can be found in *Appendix 5*. SGS will provide further information on request related to the WFP certification assessment, including how to provide any comments or input into the stakeholder consultation process.

Stakeholder input is a key part of the FSC certification assessment process. Comments submitted to SGS are shared with Western Forest Products. Note that comments will normally be attributed to the person submitting them, but you can request SGS to keep your name confidential if you prefer.

The FSC-Canada BC Steering Committee welcomes copies of any comments submitted by stakeholders to SGS on the WFP certification assessment.

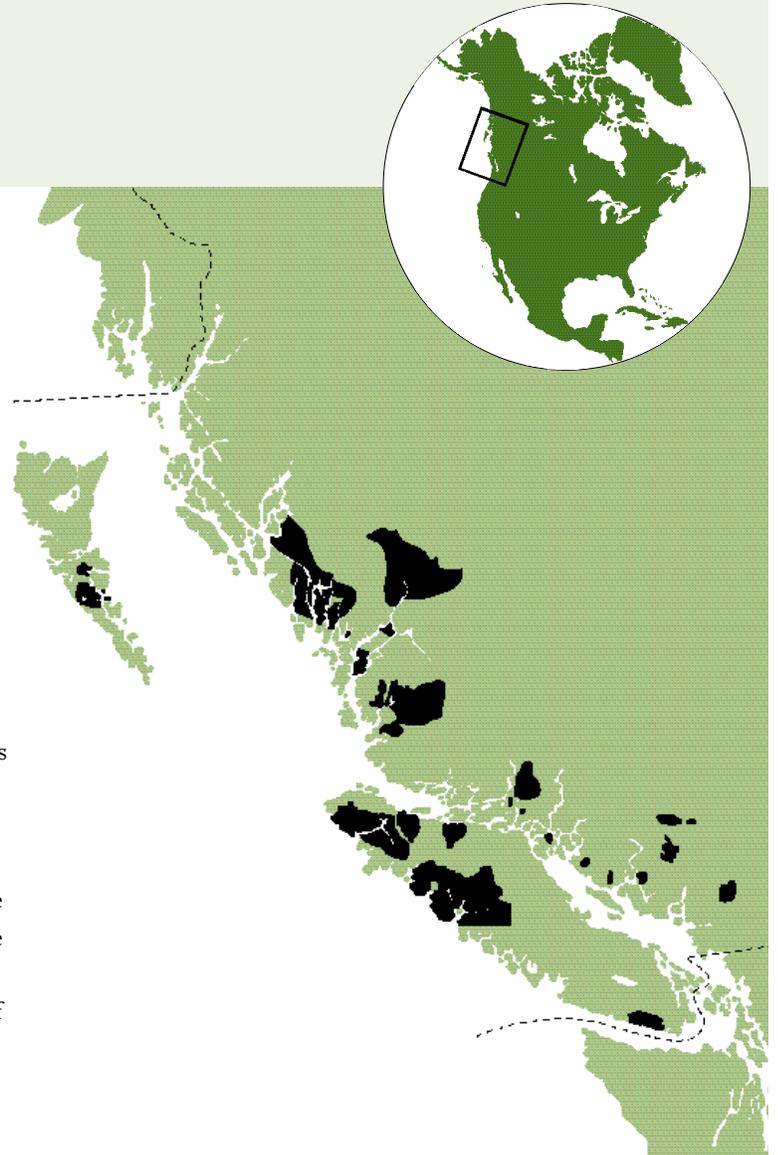
**Western Forest Products is a wholly owned subsidiary of Doman Industries Limited, and logs over 800,000 ha of Coastal forestlands in BC primarily from three operations: Vancouver Island, Central Coast, and Queen Charlotte Islands (seven sawmills and two pulp mills). It logs over 4 million cubic meters annually (89% non-local employment (8, 11)), almost exclusively by clearcutting of old growth (21, 22), on lands unceded by First Nations (most of BC is legally unceded by First Nations, (2)). Much of WFP's operations are in the few remaining large intact areas of primary temperate rainforest, recognized by the World Resources Institute, the Worldwide Fund for Nature, and many other groups as being globally rare and endangered.**

## INDICATIVE ASSESSMENT OF WFP LOGGING PRACTICES

### Introduction

The purpose of this study is to provide an early, indicative assessment of Western Forest Products' forestry operations as they compare to the Forest Stewardship Council's (FSC) Principles and Criteria for forest management. The study assesses the probable conformance of WFP's logging operations against each of the FSC's Principles and Criteria, based on a sample of the information available in the public domain on WFP's operations. This analysis identifies specific conformance or "credibility" gaps between WFP's current and planned logging practices and the performance standards that would be expected by application of the FSC's Principles and Criteria in British Columbia. This study is not a substitute for a full FSC certification assessment. The full assessment will undoubtedly uncover many more problems with WFP's operations. Therefore, while preliminary, this study provides a useful indication of the degree which WFP's operations conform to the FSC's guiding principles and criteria.

The FSC is an international, voluntary, forest management certification and labeling system, created to promote ecologically and socially responsible forest use, and help meet growing market demand for forest products from ecologically and socially responsible forestry operations. The FSC gives buyers an opportunity to support good forestry management through their purchases, and an alternative to buying from companies that use ecologically destructive logging and forest management practices. The FSC provides marketing advantages in Europe, the USA and other environmentally sensitive markets to forestry companies certified as meeting the FSC's environmental and social performance standards (82).



### Doman Operations

- Crown Timber Tenures

In early June 1998, Western Forest Products (WFP) announced they would go through a certification assessment of all its forestry operations against the FSC's social and environmental performance standards (27). The audit of WFP will be conducted by SGS Qualifor; a FSC accredited certifier organization based in the UK (68). The audit of WFP is planned to be completed by July 1999

As recently noted by the FSC, however, "the process of conducting an audit is not a guarantee that a certificate will be issued." This is because, "where performance is not found to be in conformance with FSC requirements a certificate will not be issued." (83). Nonetheless, WFP launched an intensive public relations and marketing initiative in Canada and internationally of its "commitment" to the FSC as evidence of its "green" credentials, despite the fact that its forest management has yet to be audited.

WFP's announcement that it would put all its operations through a FSC audit is surprising in several regards:

Firstly, WFP logging activities have generated substantial controversy and widespread opposition, both in British Columbia and internationally, from scientists, environmental organizations, and members of local First Nation indigenous communities, businesses and the general public. These controversies include both where WFP logs or plans to log, and how it logs.

Secondly, the same forest management practices WFP is proposing to be endorsed by the FSC — clear-cutting of primary coastal temperate rainforests — were just publicly renounced in June 1998 by British Columbia's largest forestry company, MacMillan Bloedel, as no longer socially or environmentally acceptable, either in BC or with international customers of BC coastal temperate rainforest products.

This statement was based on an intensive company wide review of its operations, scientific developments in forest ecology and management, public opinion and market assessments. The company intends to phase out clearcutting of coastal primary forests within 5 years and to gradually shift from primary forests towards second-growth forests exploitation within 25 years. In addition, the company states that certification will be applied as an objective to satisfy customers.

WFP is a wholly owned subsidiary of Doman Industries Limited. They log around 4 million cubic meters per year on over 800,000 hectares of coastal temperate rainforests on Crown lands in British Columbia from three principal areas: Vancouver Island, the Central Coast, and the Queen Charlotte Islands.

WFP logging operations consist almost exclusively of clearcutting in primary forest (also known as old-growth or ancient forests);

WFP operates in the traditional territories of 27 different First Nation (indigenous people) communities. No treaties exist between these First Nations and the BC and Canadian governments, and their rights over their territories and resources have never been ceded. Treaty negotiations are under way or planned, but only one has been completed to date;

WFP operates in numerous areas that have been identified by scientists and numerous conservation organizations as having globally outstanding conservation values, and that are priorities for protection.

**Methods:**

Western Forest Products' forestry practices are compared with the FSC's Principles and Criteria and related regionally relevant standards. Western Forest Products' forestry practices are assessed using a sample of WFP's Five-Year Development Plans (FDP) and Silvicultural Prescriptions (SP), government documents, scientific literature and communications, non-governmental reports, published field studies, journal articles, press stories, correspondence, and interviews with WFP and BC Ministry of Forests staff, environmentalists and other stakeholders.

Related regionally relevant standards under FSC procedures for WFP's certification assessment include, the SGS Forestry Checklist, The Clayoquot Sound Scientific Panel reports, the Silva Forest Foundation Standards for Ecologically Responsible Timber Management and work of the FSC-Canada, BC Technical Committee.

For each of the FSC's Principles and Criteria, relevant evidence of Western Forest Products' performance is evaluated and WFP is categorized either as:

**1. Conformance:**

*WFP operations are found to conform to the stated FSC P&C;*

**2. Non-Conformance:**

*WFP operations are found that do not conform to the stated FSC P&C;*

**3. Serious Non-Conformance:**

*WFP operations are found that do not conform to the stated Principle or Criteria, and the non-conformance is serious and/or affecting a large portion of their operations;*

**4. Insufficient Information:**

*Conformance with Principle or Criteria is not yet determinable from the information available.*

The referenced information supporting each classification of WFP's operations are organized under the appropriate FSC Principle and Criteria in chronological order.

**Results:**

Summary Results: There are 52 Criteria found under FSC Principles 1–10. Insufficient information was available from the sources used to assess 20 of these criteria, including all of Principle 10 (Plantations).

Of the remaining 32 FSC criteria under Principles 1–9, we judged Western Forest Products as follows:

<b>Conformance</b>	<b>6%</b>
<b>Non-conformance</b>	<b>25%</b>
<b>Serious non-conformance</b>	<b>69%</b>

The study yielded a 94% overall failure rate of Western Forest Products' performance in comparison to the FSC's Principles and Criteria.

Principle broad areas of WFP serious non-compliance with FSC P & C 1–9 include:

- *failure to adequately conserve primary forests of major environmental, social and cultural significance (FSC Principles 6 and 9 and related criteria);*
- *failure to adequately respect the rights of First Nations to control, use and manage their lands, territories and resources (FSC Principles 2 and 3 and related criteria);*
- *widespread use of clearcutting and other intensive forestry practices which negatively impact associated biodiversity, ecological functions and forest integrity. (FSC Principles 5, 6, 7 and 9 and related criteria);*
- *continued use of forest management systems which lead to the degradation and conversion of primary forests to short-rotation tree-farms (basis of FSC Principle 9).*

## RESULTS FOR EACH FSC PRINCIPLE AND CRITERIA:

### FSC PRINCIPLE #1:

## Compliance With Laws and FSC Principles

Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

#### **FSC Criteria 1.1**

**Forest management shall respect all national and local laws and administrative requirements.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

WFP has been cited for numerous violations of the BC Forest Act, the BC Forest Practices Code, and the BC Litter Act (3). According to BC government information obtained through a Freedom of Information request, WFP was convicted of 11 Forest Act infractions, 12 Forest Practices Code infractions, 3 contraventions of the Litter Act, and was “in non-compliance” for another 121 Code requirements, between 15 June 1995 and 26 March 1998. WFP’s Five Year Development Plans (FDPs) and Silvicultural Prescriptions (SPs) examined (19, 20, 21) appear to misclassify fish-bearing streams as non-fish-bearing streams and misclassify stream sizes as being smaller than they are on the ground, which reduces the attention they require during logging under BC law. This is a persistent problem in this region well documented by independent field audits (14).

#### **FSC Criteria 1.2**

**All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.**

#### **Western Forest Products:**

**Insufficient Information.**

#### **FSC Criteria 1.3**

**In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

Canada is a signatory of the Convention on Biological Diversity, a comprehensive agreement under which countries commit to a number of steps to secure the conservation of genetic, species and ecosystem diversity and the sustainable use of biological resources (15). Actions are to be guided by application of the precautionary principle (65). The Convention includes a number of measures relevant to the timber industry in BC under Article 6 (General Measures for Conservation and Sustainable Use), Article 7 (Identification and Monitoring), Article 8 (In-Situ Conservation), Article 10 (Sustainable Use of Components of Biological Diversity), and Article 14 (Impact Assessment and Minimizing Adverse Impacts).

Under Article 8(k) Canadian and Provincial Governments commit to develop or maintain necessary legislation and/or other regulatory provisions for the protection of threatened species and populations (15, 65). Existing regulations are considered to be largely inadequate (24), yet endangered species legislation proposed by the Canadian government and widely supported by the public was aggressively opposed by the Forest Alliance of BC, a timber industry-funded lobby group of which WFP is an active and leading member (23). The legislation was subsequently dropped from the order paper.

**“Doman Industries has had significant compliance problems at its Squamish and Port Alice facilities in BC. Although the problems occurred in the early 1990s and the company has taken steps to mitigate further compliance problems, its record of environmental fines leads the industry sector and ranks among the highest in Canada over the last five years. This record constitutes a concern.”—Michael Jantzi Research Associates, 1996**

To date, none of the five key mechanisms under the BC government’s Forest Practices Code to protect endangered species have been effectively implemented, including listing wildlife species that are endangered or threatened, protecting the habitat of endangered species, or setting aside sensitive areas critical to endangered species (24). Western Forest Products is conducting operations in numerous areas with known presence of vulnerable, threatened or endangered species, such as marbled murrelets, based on preliminary wildlife surveys (73), yet their plans do not make sufficient provisions to safeguard these species. In general, little scientific information is available on wildlife resources in the Central and North Coast region of WFP’s tenures.

The Framework Convention on Climate Change, of which Canada is also a signatory, “commits us to protecting old-growth forests and wetlands, and to sustainable forest management as part of our global obligation” (12). Nonetheless, scientific assessments from the Pacific Northwest for similar forest types and logging operations find that it takes more than 250 years for young stands following clearcutting of old-growth forests to re-sequester the carbon stored in the initial old-growth stand (66). WFP projects that its second-growth stands at harvest age (80–120 years) will contain roughly 1/3 the standing volume of biomass, and thus carbon, found in the old-growth stands that they replace (67). Old-growth temperate rainforest contain from 500–2,000 metric tonnes of organic matter per hectare, compared to a hundred tonnes or so in tropical rainforests (60).

#### **FSC Criteria 1.4**

**Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

One example of a particularly significant conflict exists between FSC Criteria 5.6 and the annual allowable cut (AAC) set by the Provincial government for WFP’s holdings. Whereas FSC Criteria 5.6 states, “the rate of harvest of forest products shall not exceed levels which can be permanently sustained,” the AAC for the Timber Supply Areas of WFP’s tenures are well above long-term sustained yield (26). (See discussion under FSC Criteria 5.6).

#### **FSC Criteria 1.5**

**Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.**

#### **Western Forest Products:**

##### **Conformance.**

This is the responsibility of the BC Ministry of Forests. However, it should be noted that since 1995 the BC government has steadily reduced funding and staffing to the Ministry of the Environment, Land and Parks. These cuts to funding limit the department’s ability to properly enforce environmental protection laws (76).

#### **FSC Criteria 1.6**

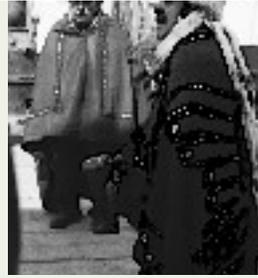
**Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

Demonstration of long-term commitment by forest managers is met by a) most importantly, a demonstrated history and current pattern of forest management consistent with FSC’s standards, b) successful achievement of FSC certification, and c) establishment of written policy commitments to adhere to FSC Principles and Criteria by the company into the future.

This assessment indicates that WFP’s forest management will require significant and far-reaching changes to be consistent with FSC standards.



Heiltsuk hereditary chief Harvey Humchitt at WFP logging site at Ingram Lake. In April more than 70 Heiltsuk people travelled to the logging site to request a one-year moratorium on all new logging on Heiltsuk lands. (GP/Simpson)

Nonetheless, WFP's chief forester, Bill Dumont, was quoted in the BC press as saying, "we do not expect in any way to have to make significant changes in our operations." (27). On CBC radio (10 June 1998), Dumont stated, "I think that our operations, the kind of changes we've made, are going to be recognized and we'll get our [FSC] certification." (84). Public statements of "commitment" to the FSC are relatively meaningless, or worse, constitute potentially misleading marketing claims (68), where they do not correspond to demonstrated adherence to forest management practices consistent with FSC Principles and Criteria.

#### FSC PRINCIPLE #2:

### Tenure and Use Rights and Responsibilities

Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

#### **FSC Criteria 2.1**

**Clear evidence of long-term forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated.**

#### **Western Forest Products:**

##### **Non-Conformance.**

Although WFP has been granted licenses to log in numerous areas of British Columbia, all of these licenses fall on publicly owned lands where land title has not been formally resolved and which are the traditional territories of First Nations. The recent Supreme Court of Canada decision concerning the Council of the Haida Nation vs. Minister of Forests et al. upheld the Haida Nation's case that unextin-

guished aboriginal title is "an encumbrance" on the government's ability to grant a logging company the exclusive rights to log in their traditional territory (28).

#### **FSC Criteria 2.2**

**Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

The purported benefits to local communities from WFP operations are promoted at length by WFP (21, 22), but this promotion masks the more fundamental issue of whether or not local communities, particularly First Nations, are able to maintain effective control over WFP's operations to the extent necessary to protect their rights and resources. Currently the burden of proof falls on the First Nation to "demonstrate how the fish and game which sustain the people use the watershed as habitat, as well as how they used the watershed, through encampments and trails in their pursuit of fish, game, berries, medicinal plants, etc." However, "Significant obstacles exist for First Nations to be able to develop and defend these rights in practice, particularly in the face of political pressure to ignore these other values if they significantly lessened timber extraction" (57). In a number of WFP's logging operations, First Nations have opposed logging plans (*Appendix 4*).

#### **FSC Criteria 2.3**

**Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.**

**“We, the Nuxalk, are opposed to the industrial clearcut logging of our traditional territories in the mid coast of British Columbia by Western Forest Products, Interfor and MacMillan Bloedel and we call for an end to it.”**

—statement issued by hereditary chiefs of the Nuxalk Nation. 4 June 1997

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

Disputes over tenure claims and use rights have led to a consistent pattern of fierce disagreements among stakeholders in WFP’s areas. In two recent cases, community members and hereditary chiefs from the Nuxalk and Heiltsuk Nations, whose traditional territories are currently being logged by WFP, have released statements and taken actions to oppose proposed logging, which have been ignored by WFP (4, *Appendix 4*)

Scientists and conservationists have similarly disputed the rights of Western Forest Products and other logging companies to continue logging in the central coast region of British Columbia while a government process established to meet the needs of a Protected Areas Strategy is not complete (77). This process, entitled the Central Coast Land and Coastal Resource Management Plan, is currently underway, but is not expected to be completed until the end of 1999 at the earliest, and only covers a portion of WFP’s tenures. During this process, only 18 per cent of the land base has been placed under deferral from logging interests, despite concerns over the risks to biodiversity values this creates, repeatedly expressed by environmental groups working on conservation issues in coastal BC (50, 78).

#### **FSC PRINCIPLE #3:**

### **Indigenous People’s Rights**

**The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.**

**Recently a number of legal decisions have been passed down by the Canadian Supreme Court which recognize the legal and customary rights of First Nations to include not just the traditional territories themselves, but also the natural resources which the territories contain (2). However, these rights are not being adequately recognized or respected by companies active in their traditional territories, including Western Forest Products. The most significant decision is the case commonly referred to as the Delgamuukw decision, decided 11 December 1997. The Delgamuukw decision formally acknowledged that the rights or aboriginal peoples to land and title exists, and defined ways in which title can be proven and ways in which section 35 of the Constitution Act must protect that title. When resource extraction is proposed on aboriginal lands, Delgamuukw stated that “there is always a duty of consultation,” and went on to state in paragraph 168 that “in most cases, it will be significantly deeper than mere consultation. Some cases may even require the full consent of an aboriginal nation...” Delgamuukw also reinforced that the rights to the land title and resources are held communally by a nation (2).**

**In no circumstance do any of the First Nations whose lands are being logged by WFP possess the legal authority to veto proposed logging: the lands where WFP logs lie in the traditional territories of 27 different First Nations (29, 67). Based on a series of Supreme Court decisions that recognize aboriginal title and rights, there is a legal requirement for logging companies to consult with First Nations, when there is logging proposed to occur on that Nation’s traditional territories, but consent is not required.**



Nuxalk chief Qwatsinas, part of the hereditary leadership of the Nuxalk Nation, who oppose WFP logging on their traditional, and unceded, lands. (GP/Wissen)

The logging company may or may not revise the FDP based on input by First Nations and other stakeholders, but is not obliged to incorporate the recommended changes.

A review of WFP's FDPs, SPs and other documents indicate that in a number of cases WFP has not incorporated recommended changes (6, 21). Legal challenges can be made by First Nations in such cases where regulatory policies have not yet caught up with Delgamuukw (2). However, this depends on the capacity of the specific First Nation to defend its rights in court—a significant obstacle in poor communities when facing powerful corporate interests.

In the case of WFP, hereditary chiefs from the Nuxalk Nation and the Heiltsuk Nation have both repeatedly written to WFP and requested that proposed logging not proceed: in each case, the logging company has chosen to proceed (4, 21).

It should be noted that, although WFP is not in violation of existing law, it is in conflict with recent court decisions which support the basis of Principle 3, and with Principle 3 itself.

#### **FSC Criteria 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.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

The mechanism for providing “free and informed consent” must entail the ability of a Nation to veto proposed development on their territories. This mechanism is currently lacking in provincial and federal legislation and is not observed in practice by WFP: In no circumstances on lands where WFP logs are First Nations legally able to veto proposed development.

Further, Delgamuukw has defined that the rights of the Nation are held communally, which indicates that in order to be in conformance with criteria 3.1, the overwhelming majority of a Nation must have delegated control freely and with informed consent.

However, in a number of cases it is evident that communities are divided over logging proposed by Western Forest Products (*Appendix 4*).

#### **FSC Criteria 3.2**

**Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

The Supreme Court of Canada's upholding of the case the Council of the Haida Nation vs. Minister of Forests et al. recognized that unextinguished aboriginal title and rights are “an encumbrance” on the government's ability to grant exclusive logging rights to a logging company. In that case, MacMillan Bloedel had exclusive rights to log on Haida land, via the granting of Tree Farm License 44 (TFL44). WFP similarly has been granted exclusive logging rights via TFLs 6, 19, 24 and 25 (28, 30).

Coastal First Nations' communities have traditionally relied heavily on hunting, as well as fishing for salmon and other marine resources, for subsistence and income. Forest use has also historically and currently supported the gathering of medicinal plants and other non-timber resources by coastal Nations. Ongoing logging by Western Forest Products is currently diminishing the resources of 27 First Nation communities in coastal British Columbia, including significant cultural heritage resources (67).

#### **FSC Criteria 3.3**

**Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

Culturally Modified Trees (CMTs) are trees, generally cedars, which at some time in the last 500 years or so,

**“We do not support the clearcutting of old growth in the Ingram-Mooto. WFP is ignoring our request for a one-year deferral even though the Delgamuukw and Gladstone cases acknowledge that First Nations people have the right to financially share in the benefits of development in their homelands. We want the logging of old growth to stop for the sake of all British Columbians.”**—hereditary chief Chief Harvey Humchitt

have had some of their bark harvested for various uses by the local First Nation. The tree is not killed, and evidence of past harvest and use patterns is therefore maintained in the forest on the trunks of the trees. These CMTs are of tremendous cultural importance to First Nations, and legal importance as well, as their presence proves the customary use of an area by that Nation. The Heritage Conservation Act obliges logging companies to identify these cultural sites.

However, an independent survey of CMTs in three coastal inlets where WFP proposes to log found that whereas WFP listed CMTs as being absent, more than 130 such features were found in these areas (6). A further study revealed that in the case of cutblock 229H in the Aaltanhash, WFP’s surveyors recorded only 25 CMTs, while independent research found 50 such features.

#### **FSC Criteria 3.4**

**Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.**

#### **Western Forest Products:**

##### **Serious Non-Conformance.**

The Criteria acknowledges that traditional knowledge is of value and that it should be applied when developing forest management plans. In British Columbia, the value of this approach was recognized by the Scientific Panel for Clayoquot Sound, which was co-chaired by a scientist and a First Nation representative (12). The recommendations of the Scientific Panel were shaped both by the traditional knowledge and ecological insights accumulated by the Nuu-chah-nulth people and the scientific basis for ecosystem based forest management as developed for these forest types. The Panel’s recommendations were accepted in their entirety by the government of British Columbia.

No similar process has been or is even close to being applied in any of WFP’s tenures. WFP only lightly discusses indigenous peoples’ traditional knowledge regarding the use of forest species or management systems in their forest operations (21, 22). Indeed, it appears that WFP has little interest in indigenous peoples’ knowledge. There is no evidence that traditional knowledge has been assessed or incorporated in any meaningful way into WFP’s planning, or that indigenous peoples have been compensated for their knowledge before forest operations commence. Indigenous elders and chiefs warn of forest mismanagement in letters and other testimony, but WFP fails to incorporate their knowledge into its management plans. (*Appendix 4, 4, 6, 16*).

#### **FSC PRINCIPLE #4:**

### **Community Relations and Workers’ Rights**

**Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.**

**Local community well being is not maintained over the long-term by WFP as the timber supply is being exhausted by an unsustainable rate of cut. As the primary forest is cleared, the plantations are not maturing fast enough to produce timber at volumes that can support sustainable cutting (even though BC law theoretically requires sustainability). Some regions will wait 50 years without logging before there is sufficient timber available again (26).**

**The short-term economic well being of some forest workers may exist. However, the long-term social and economic well being of forest workers and local communities are not maintained or enhanced by WFP forest management operations. For example, according to a socio-economic**

review of employment in the Mid-Coast Timber Supply Area of the BC coast, 89% of the timber industry workers who rely on timber from the region are non-residents (11). All of the processing of timber cut in this region by WFP, as well as on the Queen Charlotte Islands, is shipped either to Vancouver Island or to the lower mainland (30). Hereditary chiefs and community members of the Heiltsuk Nation have written directly to WFP to express their concerns over how little benefit their community derives from logging in their traditional territories (appendix 4). The Oweekeno-Kitasoo-Nuxalk First Nations elected councils have also expressed their concerns over the lack of employment in their communities while their traditional territories continue to be logged (79). Nuxalk Hereditary Chiefs have voiced similar concerns. Finally, a 1996 draft discussion paper by the Central Coast Regional District (an area in which WFP holds forest tenure) stated that “Our bottom line and the bottom line of those actively involved in forest logging are vastly different and not to the benefit of our communities” (80).

**FSC Criteria 4.1**

The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.

**Western Forest Products:**

**Non-conformance.**

WFP occasionally employs First Nations people in the short-term, for example, on silvicultural projects: however, WFP employs very few First Nations people on a full-time basis and provides training for only a small percentage of First Nations people living in areas adjacent to where WFP operates. For example, no people from the Nuxalk Nation are employed full-time by WFP and only approximately 20 people from the Heiltsuk Nation have been trained and given job opportunities by WFP.

**FSC Criteria 4.2**

Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 4.3**

The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 4.4**

Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.

**Western Forest Products:**

**Non-Conformance.**

As is outlined in documents contained in *Appendix 4*, a number of First Nations have stated that concerns expressed to Western Forest Products have not been incorporated into WFP management plans.

Social impact analyses of broader industry trends have been produced by both government as well as independent researchers and writers which are highly critical of the tenure system in BC, due to the concentrated control of only a few large companies over the vast majority of forested Crown lands. Similarly, the lack of a developed value-added sector within the industry has been profoundly criticized, as BC continues to export minimally processed wood products (81). There is no indication that WFP has incorporated the results of such analyses into their operations (21, 22).

**FSC Criteria 4.5**

Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.

**Western Forest Products:****Non-Conformance.**

We were unable to find evidence of any effective mechanism employed by WFP to resolve grievances or for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources or livelihood of local peoples. Virtually all lands on which WFP logs are within unceded First Nations territories. Clearcut logging on these lands causes numerous losses and damage. The evidence indicates that WFP ignores such loss or damage on an ongoing basis (6, 14, 16, 39, 42).

There is currently no existing policy either within the BC government or within the policies of WFP to provide compensation to indigenous peoples whose customary rights to the land have not been adequately addressed. Although treaty negotiations for lands contained in the vast majority of WFP's operations are now underway, no compensation or royalties are paid to First Nations or to escrow accounts by government or industry for the extraction of timber from their traditional territories.

**FSC PRINCIPLE # 5:****Benefits From the Forest**

Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

Compliance with this Principle requires assessments of the full range of forest products and services using wholistic ecosystem planning approaches (12, 13, 39, 42). Such multiple products and services include fish, game, food plants, medicines, cultural and spiritual sites, soil, riparian and overall ecosystem functioning, forest productivity, ecotourism, wildlife and fish habitat, biodiversity, wildcrafting, conservation areas, wilderness, recreation, and other forest products. Efficient use of multiple products and services implies that only when they are all recognized and sustained can an environmentally and socially beneficial, viable long-term economy emerge (12, 47). Current WFP planning is driven by a too narrow focus on maximizing timber values at the expense of seriously compromising other values. WFP is using clearcutting as the logging methods in 95% of the cut-blocks reviewed (21, 22, 39, 42).

Overall, we find WFP's on-the-ground plans are diametrically opposed to the efficient use of the forest's multiple products and services. WFP's plans are to convert areas containing such multiple products and ecosystem services into areas where many of these will no longer be maintained (21).

**FSC Criteria 5.1**

Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.

**Western Forest Products:****Serious Non-Conformance.**

The full environmental, social, and operational costs of production are not measured by WFP. A review of FDPs and SPs indicates that WFP practices are in conflict with maintaining the ecological integrity and hence productivity of old growth forests and their values because WFP operations remove trees faster than they can be replaced and because the predominant harvesting practice of clearcutting does long-term damage to soils, wildlife, fish, and riparian habitats which underpin ecosystem functioning (19–22, 39, 42).

Areas logged by WFP are not intended to be allowed to mature into late-successional forests. WFP plans to log them again in 80–100 years, whereas the ancient forest they are replacing is generally over 250 years old (21, 39, 40). Furthermore, 80% of the world's original primary forests have already been destroyed, impacted or converted to plantations, and 80% of the pristine rainforest valleys on the BC Coast have already been impacted by logging (32, 33, 34). WFP plans to develop five of the remaining pristine valleys in the next two years (21, 22).

Stumpage paid by WFP in most circumstances is significantly lower than market rates in BC, and lower than stumpage rates paid by companies logging in similar forest types in the Pacific Northwest of the United States. These rates do not ensure resources for investments necessary to maintain the ecological productivity of the forest, and the full environmental and social costs are largely ignored (10, 38, 42). "For instance, studies have determined that the government-run Small Business Forest Enterprise Program, which is based on competitive prices, produces a rate of return 2.5 times as high to the government. Additional comparisons of stumpage prices in BC with the adjacent National Forest in the United States, where timber is sold at public auction, demonstrates that differences in values are up to 10 times higher" (10). This strongly indicates that forest management in BC is not economically viable, and the full environmental, social, and

operational costs of production are not ensuring the investments necessary to maintain the ecological productivity of the forest.

**FSC Criteria 5.2**

**Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.**

**Western Forest Products:****Serious Non-Conformance.**

Many of WFP's logging operations are located hundreds of kilometers away from their pulp and sawmill processing facilities (30). For example, WFP logs 460,000 cubic metres of timber annually in the Mid-Coast Timber Supply Area, yet it does not operate a processing facility in the area and so ship all the logs hundreds of kilometres south to the Vancouver/southern Vancouver Island region (11, 30).

Unemployment in the Mid-Coast region is extremely high; the region has the highest percentage of aboriginal population in the Province, and the lowest per capita income of any region in the Province. The average wage is extremely low: average annual earnings in the region in 1995 were \$9,823 per year, compared to the provincial average of \$19,508 (31).

**FSC Criteria 5.3**

**Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.**

**Western Forest Products:****Insufficient Information.****FSC Criteria 5.4**

**Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.**

In 1997 Western Forest Products commissioned a report which concluded that logging would not damage the habitat of the rare Kermode or Spirit bear. However, according to Dr. Brian Horesji, a well-respected Canadian wildlife scientist, “The report fails to address many significant issues in bear conservation, including impact of degraded habitat effectiveness associated with roads and human activity, mortality risk, suppression of the old-growth understory with clearcut logging and closed canopy effects of forage production as regeneration advances.”

**Western Forest Products:**

**Non-Conformance.**

Studies done of the Provincial Fish and Forestry guidelines found that WFP was in non-compliance with these guidelines on numerous occasions, undermining fisheries values as well as tourism potential in regions where WFP operates (14).

**FSC Criteria 5.5**

**Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.**

**Western Forest Products:**

**Serious Non-Conformance.**

Watersheds are basic functional ecological units in coastal temperate rainforests (12). Of the 353 coastal rainforest watersheds found on the West Coast of Canada, around 80% of these have been degraded or are under current development by logging companies. In WFP’s case, they have plans or licenses to log 21 of the key ecological areas. Pristine, unlogged temperate rainforest watersheds in BC are endangered landscape features whose conservation, along with a number of other key ecological areas, has been identified as a very high regional and global priority (eg, 33, 34, 50, 60, 69, 70, 71, 72). This has received further endorsement from numerous scientists (75).

The most thorough assessment to date on impacts of forestry-related activities on fisheries was a series of reports commissioned by the BC Ministry of Forests, principally authored by Derek Tripp. In this series, WFP was found to have been in non-compliance with Provincial Fish and Forestry Guidelines in more than 80% of the stream reaches evaluated on the North Coast—the highest percentage of all companies examined. In one study more than 70% of streams logged by WFP had reduced stability (14). A recent assessments of WFP’s FDP for Ingram Lake found that although the first draft of the FDP classified some streams as being fish-bearing, subsequent drafts unjustifiably downscaled the streams and classified the streams as non-fish-bearing (19, 20, 21).

Under the Forest Practices Code, non-fish-bearing streams (classes S5 and S6) are not afforded any riparian zone protection, in which trees must be left standing in a buffer zone strip next to the stream.

**FSC Criteria 5.6**

**The rate of harvest of forest products shall not exceed levels which can be permanently sustained.**

**Western Forest Products:**

**Serious Non-Conformance.**

Setting current logging levels that cannot be permanently sustained is the norm in British Columbia (26). This policy is designed to aggressively and quickly convert primary forests across the landscape into second-growth tree farms and plantations which yield a lower volume of timber (42). For example, a review of the Timber Supply Area analyses found that in all areas where WFP operates, the current level of the Annual Allowable Cut is higher than what the Chief Forester of British Columbia has determined to be the level that can be permanently sustained. In some cases, such as in the Mid-Coast Timber Supply Area, the current level of cut is almost double that which the Chief Forester deems can be permanently sustained. In essence, the model of forestry which is practiced by WFP is derived from old-school forest management policies established by the Sloan Commission in 1945 whose vision was to rapidly convert BC’s primary forests into “normalized forests” which maximize the production of timber (61).

The Clayoquot Sound Science Panel recommended that timber planning be ecosystem-based, rather than volume-driven as is currently practiced by WFP. Planning focuses as the first priority on forest retention, at all scales, in order to sustain the ecological integrity and functioning of the forest ecosystems. “The flow of forest products must be determined in a manner consistent with objectives for ecosystem sustainability. This entails abandoning the specification of Annual Allowable Cut as an input to local planning.” (CSSP Recommendation 7.1).

**“One in ten species of vertebrate animals and plants are threatened or endangered in British Columbia. Logging poses the second greatest threat to vertebrate animals.”**

—British Columbia Ministry of Environment, Lands and Parks

The shift to ecosystem area-based planning is “critical to successfully implement other Panel recommendations and to achieve sustainable ecosystem management” (12). The BC-based Silva Forest Foundation also requires ecosystem-based planning processes in its Timber Management Standards for British Columbia (13).

**FSC PRINCIPLE #6:**

## **Environmental Impact**

**Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.**

Coastal temperate rainforests are a unique and rare forest type. They are found only in narrow bands along coastlines backed by mountain ranges with high rainfall levels. Under natural conditions they are characterized by very large, old trees with multi-story canopies, an abundance of riparian habitats, and ecosystem productivity among the highest on Earth (40, 60). Major community or landscape level disturbances are rare, with the exception of clearcut logging (12, 60).

Globally, coastal temperate rainforests are rare, originally covering only 31 million hectares or 0.2% of the earth’s land surface. Principal ranges are on the west coasts of North America, Chile and New Zealand, each with its own unique species composition. Today, one half of these original forests have already been destroyed. The largest extent of unprotected ancient temperate rainforest, which remains, is found in British Columbia. These forests

provide home to grizzly and black bears, to eagles and wolves, and to threatened species such as the marbled murrelet seabird, which depend on the ancient forests for their survival.

Species-area relationships from Conservation Biology science indicate that protecting 35–50% of the natural forests in disturbed temperate regions is needed to conserve biodiversity (36, 39, 42). WFP cannot maintain the unique, fragile ecosystems, the ecological functions, or the integrity of the primary temperate rainforest, nor conserve biological diversity and its associated values by clearcutting and converting the primary forests to short rotation tree farms—yet almost all WFP planning incorporates these techniques (21).

Effective conservation of biological diversity and its associated values in BC’s coastal temperate rainforests requires full protection of key ecological areas in large reserves, and fundamental changes to forest practices outside of these reserves. The independent Clayoquot Sound Science Panel’s recommendations provide a particularly important benchmark for FSC certification standards in coastal temperate rainforests in British Columbia. The mandate of the Science Panel from the BC Provincial Government was to create a plan for “world-class” logging for the coastal temperate rainforests in Clayoquot Sound. It was the first time that temperate rainforest forestry practices had been so carefully analyzed in British Columbia with a primary focus on maintaining ecosystem integrity and long-term social and economic needs. The CSSP produced five reports and more than 120 recommendations, built on an ecosystem-based approach to forest management planning. In fulfilling its mandate, the CSSP “is widely credited with having turned logging on its head in British Columbia” (47). In this regard, the CSSP recommendations are much more consistent than the BC Forest Practices Code with the FSC’s guiding Principles and Criteria (12).

**“Recognizing the ecological importance of rainforest of British Columbia, and the fact that current management is ignoring and sacrificing a wide range of present and future values and uses, we the undersigned scientists recommend that the governments of British Columbia and Canada ... apply a moratorium on industrial logging and development in the remaining intact valleys of British Columbia.”**—Letter to the Prime Minister of Canada and the Premier of BC from 50 renowned scientists

#### ***FSC Criteria 6.1***

**Assessment of environmental impacts shall be completed—appropriate to the scale, intensity of forest management and the uniqueness of the affected resources—and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.**

#### ***Western Forest Products:***

##### ***Serious Non-Conformance.***

There is no evidence in WFP documents that the environmental impact of clearcutting on ancient rainforests are considered or debated, nor is there evidence that WFP recognizes the uniqueness of affected resources in the ecological sense (9, 12, 13, 17, 19, 20, 22, 36, 65, 75). Clearcutting is virtually the only logging practice used by WFP and yet the Clayoquot Sound Science Panel report included a significant critique of conventional clearcutting for these forest types (12). The Panel found that clearcutting “changes hydrological patterns, leads to instability and soil erosion on steep slopes, causes soil loss, removes habitat for old-growth dependent species, reduces species diversity, changes the structure of the forest to the detriment of certain species, damages areas of cultural significance and is unattractive to many people.” (12, 49).

Landscape level considerations rightly include broader regional assessments of the uniqueness of affected resources, such as pristine watersheds and other key ecological areas, given the scale and intensity of WFP’s operations (54, 55), but independent scientific conservation gap assessments are not integrated into WFP planning and operations (32, 36, 75). WFP’s own wildlife surveys are extremely preliminary and limited in comparison to the scale and intensity of forest operations and the uniqueness of affected resources. These include in WFP operations, habitat for various threatened, endangered and rare populations of species (73).

#### ***FSC Criteria 6.2***

**Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources.**

#### ***Western Forest Products:***

##### ***Serious Non-Conformance.***

Conservation safeguards, if they are to avoid putting species at risk from timber extraction activities, must use what is known about the ecology of the species, and then build in additional “margins of safety” to buffer against “knowledge gaps” and scientific uncertainties (46). When uncertainty is high, conservation measures must be more robust.

There are several levels of uncertainty. First is the uncertainty which arises from a lack of adequate data, such as that arising from the very minimal set of biological surveys of rare, threatened and endangered species which have been conducted in WFP tenures to date (see 6.1 above). Second is the far from complete scientific understanding of the biological communities, ecological functioning and ecosystem dynamics in primary temperate rainforests as habitats for populations of these species and for the individual species themselves (52). Further, each watershed has entirely separate biological characteristics (47). Finally, there are additional long-term uncertainties arising through the anticipated impacts on North American temperate rainforests induced by climate change from global warming. Forests recovering from clearcut logging are considered to be more vulnerable than those which are relatively intact (48).

As a management response to scientific uncertainty, the Clayoquot Sound Science Panel adopted a “conservative” or “precautionary approach” to resource management. These are “defined respectively as: ‘Conservative management means giving the benefit of the doubt to the resource rather than to its extraction or development (12);’ and ‘the “precaution-

ary principle”...applies when there is uncertainty about possible cumulative effects, irreversible changes, adverse interaction, or negative long-term effects...”(12, 49).

Populations of rare, threatened and endangered species which are or will be significantly impacted by WFP logging activities and plans in primary forests include: marbled murrelets; grizzly bears; the white Kermode Bear, or Spirit Bear; a number of populations of wild salmon species; tailed frogs and Roosevelt Elk. As discussed elsewhere throughout this document, while these issues are referenced in WFP documents, little is done on the ground that will protect rare, threatened and endangered species and their habitats (9, 13, 14, 15, 16, 17, 19, 20, 21, 22, 39, 40, 41, 42). The limited measures implemented by WFP are completely inconsistent with the precautionary approach. For example, while WFP is aware that marbled murrelets have been observed flying into watersheds that it plans to log (45), it conducts no appropriate ground surveys to determine their nesting patterns, and in fact plans to clearcut stands which contain highly desirable nesting habitat characteristics for the species.

Similarly, WFP plans to clearcut log in a number of pristine watersheds which provide important core habitat and feeding areas vital for the long-term survival of coastal populations of grizzly bears, yet WFP lacks reliable basic field data on even the age and gender composition of these populations. There is, however, significant evidence based on past experiences to indicate that WFP logging operations will create both cumulative negative effects, adverse interactions, potentially irreversible changes in population viability and threaten their long-term survival (51). Again, the measures WFP proposes to implement fail to provide adequate safeguards for this threatened species, its habitat or feeding areas. Rather, it places populations of this species at greater risk.

Both these examples are indicative of a much wider pattern of serious non-conformance with this Criteria by WFP. (See also, 1.3) The threats to endangered

species and wildlife posed by the failure to fully implement the BC Forest Practices Code (and the limitations of the Code in this regard, even if fully implemented), under which WFP operates, are discussed in detail in a Sierra Legal Defense Fund briefing. It offers a useful reference for more detailed assessments of WFP’s operations under this criteria (24).

### **FSC Criteria 6.3**

**Ecological functions and values shall be maintained intact, enhanced, or restored, including:**

- a) Forest regeneration and succession.**
- b) Genetic, species, and ecosystem diversity.**
- c) Natural cycles that affect the productivity of the forest ecosystem.**

### **Western Forest Products:**

#### **Serious Non-Conformance.**

The Clayoquot Sound Science Panel found that ecological functions and values of primary temperate rainforests in BC are not maintained intact, enhanced or restored by conventional clearcutting and management driven by timber extraction, as practiced by WFP (12). Wide use of clearcutting, burning and herbicides, and short rotations nullify important ecological functions of natural forest regeneration and succession throughout WFP operations (21, 39, 41, 42, 43). Genetic, species and ecosystem diversity is put at significant risk by WFP’s planning approach which puts timber extraction over ecosystem values (12). WFP’s clearcutting fails to correspond to natural disturbance cycles which occur in this forest type. Openings are larger, frequency is greater, removals are higher, and WFP rotation cycles are shorter than those which occur in natural disturbance regimes, and this degrades the overall productivity of the forest ecosystem (12, 52, 53). Late successional stages are not regenerated by WFP. Natural cycles that affect the productivity of forest ecosystems have provided no such disturbances to the primary forest for thousands of years. Presently, clearcutting and burning provide enhanced conditions for many of the plant species

that WFP later claims it needs to spray with herbicides (21, 43). (See also 5.5 for impacts on the productivity of the riparian components of the forest ecosystem.)

**FSC Criteria 6.4**

**Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.**

**Western Forest Products:**

**Serious Non-Conformance.**

Establishment of a representative network of coastal temperate rainforest reserves in the areas where WFP is operating has yet to be completed. The ecological basis for effective reserve planning involves a nested approach, which identifies conservation needs in the landscape starting at the regional level, then sub-regional, watershed and finally within the forestry operation units (12, 13, 49, 54, 55, 63, 64). In British Columbia, maintaining the ecological integrity of traditional cultural uses, resources and sites of First Nations should also be factored into the reserve strategies before defining timber extraction zones (12, 13, 56, 57). (see also Principle 3 and related criteria)

At the regional scale, WFP is operating or planning to operate intensive logging operations in 21 key ecological zones on the BC mainland coast alone which have been identified as regionally and globally important conservation priorities. These areas should be protected under this FSC criteria. WFP's plans to implement operations in these high conservation value areas have sparked high-profile regional, national and international protests.

Some small representative samples of existing ecosystems within watersheds are planned for protection in their natural state and recorded on FDP maps (21, 22). However, the scale and intensity of WFP's operations of widespread clearcutting adjacent to these representative samples will make these islands ineffective to maintain the uniqueness of the affected resources (12, 13, 39, 40, 42). For example,

WFP plans a Forest Ecosystem Network (FEN) near Ingram Lake but by completely removing the surrounding forest, the FEN is too small to maintain unique resources. The few wildlife corridors that exist in WFP's FDPs will be ineffective to conserve wildlife movement because they are too small and placed in areas of insufficient vegetation and slope to be useful to most wildlife species which reside in these areas. For example, only 508<sub>HA</sub> of operable forest is proposed to be conserved in the Forest Ecosystem Network planned for the Ingram Lake area of some 14,000<sub>HA</sub>, yet the entire area has high conservation values (32), is adjacent to Fiordland Provincial Park, and contains an array of endangered, threatened, and sensitive species that conservation biologists believe will require both the park and the entire Ingram area to survive as healthy populations (21, 36, 39, 40, 75).

WFP planning and operations, which focus on timber extraction rather than forest retention, stand in stark contrast to the ecosystem-based planning approach recommended by the CSSP and Silva Forest Foundation standards (12, 13).

**FSC Criteria 6.5**

**Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.**

**Western Forest Products:**

**Non-Conformance.**

Some written guidelines are prepared, as required under the BC Forest Practices Code, but they have proven ineffective in protecting water resources (19, 20, 21, 22, 58) (See also, FSC criteria 5.5). Similarly, written guidelines to control erosion and landslides, as required under the BC Forest Practices Code, are either being ignored, not effectively implemented, or are simply inadequate to achieve soil erosion objectives (59). For example, the Clayoquot Sound Science Panel severely restricts logging on steep landslide-prone slopes, but the Code, under which

WFP is operating, does not incorporate any of the Science Panel's recommendations. More detailed discussion of these issues can be found in relevant Sierra Legal Defense Fund reports (58, 59).

Few measures are taken by WFP to maintain or improve soil structure, fertility, or biological activity (21). Rate of logging, road and trail construction and maintenance, slashburning, herbicides, and the choice of species to be replanted will result in long-term soil degradation and adverse impacts on water quality and quantity, and will result in substantial deviation from stream course drainage patterns (12, 17, 19, 20, 21, 22, 39, 41). The use of large-scale equipment in both logging and yarding will exacerbate negative impacts on soil structure as found by the CSSP and other studies.

**FSC Criteria 6.6**

**Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.**

**Western Forest Products:**

**Non-conformance.**

WFP's clearcutting practices create conditions which lead to the use of herbicides, whereas alternative logging helps avoid the use of herbicides (42). Herbicides are used to eradicate around four-fifths of forest plants which are enhanced by the practice of clearcutting (43). The use of herbicides is not avoided by WFP but promoted (21,41). A review of WFP's SPs reveals that the herbicide Vision/Roundup is named as the acceptable brushing tool in the management of 95% of the planned plantations, whereas the chemical has been shown to damage or eradicate

several non-target, rare or endangered vertebrate species from treatment areas (41). Integrated pest management or biological or other non-chemical control methods are not proposed by WFP in management plans (21, 22).

**FSC Criteria 6.7**

**Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.**

**Western Forest Products:**

**Insufficient Information.**

However, a recent field audit of a WFP operations in the Mid-Coast region found unattended barrels of aviation fuel stored in wetland areas and without soil berms to prevent water contamination in case of accidental spills or leakage (74).

**FSC Criteria 6.8**

**Use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.**

**Western Forest Products:**

**Insufficient Information.**

**FSC Criteria 6.9**

**The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.**

**Western Forest Products:**

**Insufficient Information.**

**FSC PRINCIPLE #7:****Management Plan**

A management plan—appropriate to the scale and intensity of the operations—shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.

**FSC Criteria 7.1**

The management plan and supporting documents shall provide:

- a) Management objectives.
- b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.
- c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.
- d) Rationale for rate of annual harvest and species selection.
- e) Provisions for monitoring of forest growth and dynamics.
- f) Environmental safeguards based on environmental assessments.
- g) Plans for the identification and protection of rare, threatened and endangered species.
- h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.
- i) Description and justification of harvesting techniques and equipment to be used.

**Western Forest Products:****Non-conformance.**

While WFP has a management plan, as required under the BC Forest Practices Code, the intent and content of WFP's management plan, and the process by which it was developed, do not correspond to the ecosystem-based planning, management and monitoring framework recommended by the Clayoquot Sound Science Panel (12). The long-term objectives of management, although stated, are untenable, given scientific knowledge of ancient forest life cycles and the functioning of rainforest ecosystems (12, 13, 21, 36, 39, 40, 42, 52, 53, 69).

As discussed elsewhere in this report, WFP's management plans are inadequate since they fail to effectively achieve the objectives of many of the elements listed above consistent with the FSC's Principles and Criteria. For example, while WFP has "plans" for the identification and protection of rare, threatened and endangered species, their effectiveness in achieving this objective is not scientifically credible or rigorous (see FSC Criteria 6.2, 36). The Management Objectives for almost all WFP SPs researched are "to produce a mixed stand with an average diameter of 45 cm within an anticipated 90–120 year rotation," even though the natural forest is 3–4 times that age and the life history of cedar is such that few cedar trees will mature to produce natural forest recruitment before short rotations are planned to remove them (21).

**FSC Criteria 7.2**

The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.

**Western Forest Products:****Serious non-conformance.**

The use of new scientific and technical information, as well as any indications of a responsiveness to changing environmental, social and economic circumstances, are seriously lacking in WFP's Five Year

Development Plans reviewed (21). Again, a significant benchmark is the findings of the Clayoquot Sound Science Panel and its recommendations, but they are not incorporated in WFP's management plans or planning process. Results of independent monitoring, reviews of the effectiveness of management measures for achieving environmental objectives and scientific assessments of conservation needs in the areas where WFP is operating are not incorporated into management plans (9, 17, 24, 36, 58, 59, 60). Polling of BC residents in 1997 found 69% of those surveyed felt that, with alternative logging practices available, clearcutting should not be allowed to continue. Seventy-seven percent of British Columbians believe that logging of BC's old growth forests should be stopped immediately or phased out (37, 61). Despite this shift in social values, WFP continues to use clearcutting as its predominant logging practice in primary forests on publicly held Crown lands (21, 22).

**FSC Criteria 7.3**

**Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.**

**Western Forest Products:**

**Insufficient Information.**

**FSC Criteria 7.4**

**While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.**

**Western Forest Products:**

**Conformance.**

WFP's five-year forest development plans are made publicly available by the BC Ministry of Forests on a cost basis.

**FSC PRINCIPLE #8:**

**Monitoring and Assessment**

**Monitoring shall be conducted—appropriate to the scale and intensity of forest management—to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.**

**FSC Criteria 8.1**

**The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.**

**Western Forest Products:**

**Serious Non-conformance.**

WFP's frequency and intensity of monitoring on the ground is insufficient to provide the monitoring data required to assess the ecological complexity and fragility of the biological resources at the range of scales required to make scientifically meaningful assessments which can detect changes to populations of sensitive species, ecosystem dynamics and environmental impacts resulting from their operations in primary forests (12, 21, 22, 39, 40, 42). Most WFP monitoring is related to timber production, while the social and environmental impacts of WFP operations are not rigorously monitored. Nor is the precautionary approach applied where there is a lack of appropriate monitoring data and/or where there are scientific uncertainties, as recommended by the Clayoquot Sound Science Panel and IUCN (12, 65).

**FSC Criteria 8.2**

Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:

- a) Yield of all forest products harvested.
- b) Growth rates, regeneration and condition of the forest.
- c) Composition and observed changes in the flora and fauna.
- d) Environmental and social impacts of harvesting and other operations.
- e) Costs, productivity, and efficiency of forest management.

**Western Forest Products:**

**Serious Non-conformance.**

See Criteria 8.1, above.

**FSC Criteria 8.3**

Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."

**Western Forest Products:**

**Insufficient Information.**

**FSC Criteria 8.4**

The results of monitoring shall be incorporated into the implementation and revision of the management plan.

**Western Forest Products:**

**Insufficient Information.**

**FSC Criteria 8.5**

While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.

**Western Forest Products:**

**Insufficient Information.**

**FSC PRINCIPLE # 9:****Maintenance of Natural Forests**

Primary forests, well-developed secondary forests and sites of major environmental, social or cultural significance shall be conserved. Such areas shall not be replaced by tree plantations or other land uses.

A new version of Principle 9 is being prepared for FSC endorsement, and should be available by November, 1998. Pending the outcome of this process, FSC accredited certifiers are restricted from certifying large-scale intensive logging operations in primary forests such as those of WFP. As WFP operations are clearly failing to conserve primary forests and sites of major environmental, social and cultural significance throughout their tenures, they are in fundamental non-compliance with Principal 9 as it currently stands.

**FSC Criteria 9.1**

Trees planted in natural forests may supplement natural regeneration, fill gaps or contribute to the conservation of genetic resources. Such plantings shall not replace or significantly alter the natural ecosystem.

**Western Forest Products:**

**Serious Non-Conformance.**

WFP significantly alters and replaces the natural ecosystem in almost all their operations as multi-aged, structurally diverse, ancient forest stands are converted to short-rotation, simplified tree-farms (21). Ancient cedar/hemlock forests are replaced with younger, short-rotation, planted stands, whereas important wildlife species predominantly use old cedar/hemlock, much older than the planned rotation age (12, 21, 39, 40, 42). Rather than limited planting

to supplement natural regeneration, stands are frequently intensively planted with limited natural regeneration.

WFP's selection of species for planting is generally based on their overall suitability for the site. However, there is a tendency for WFP's SPs to accept species such as spruce/balsam for planting when the natural forest is dominated by cedar/hemlock: this is likely attributable to the fact that spruce/balsam lend themselves to shorter rotations to reach logging age and are of more economic interest to industry than cedar/hemlock (21).

The "gaps" which are created by WFP clearcuts are significantly larger than the typical gaps which occur through typical disturbance regimes of the natural ecosystem (CSSP).

#### ***FSC Criteria 9.2***

**The use of replanting as a technique for regenerating stands of certain natural forest types may be appropriate under certain circumstances. Guidelines on the acceptable intensity and spatial extent of tree planting will be addressed in national and regional forest management standards to be approved by the FSC. In the absence of such national or regional standards, guidelines developed by the certifier and approved by the FSC will prevail.**

***Western Forest Products:***  
**Insufficient Information.**

#### **FSC PRINCIPLE # 10:**

### **Plantations**

**Plantations shall be planned and managed in accordance with Principles and Criteria 1–9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.**

**Principle 10 should only apply to Western Forest Product tenures to the extent that it is relevant to the management of its holdings which it has converted from primary forest to stands meeting plantation definitions as a result of past activities. Any new conversions are explicitly prohibited under FSC Principle 9. A strong case can be made that WFP is converting many primary forest stands into plantation-like stands under its current management plans. Nonetheless, given that conversion of primary forest to plantations is prohibited, and as virtually all of WFP's logging operations are in primary forests, Principle 10 and related criteria should not apply and were not a focus of this report. However, restoration objectives and standards for existing plantation areas of WFP's holdings (as well as other previously harvested areas) will need to be established by SGS and the FSC-BC Committees. Improved management of these areas is important for restoring forest ecosystem health and integrity damaged by past logging activities. In this regard, the restoration related criteria below are significant.**

**FSC Criteria 10.1**

The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 10.2**

The design and layout of plantations should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamside zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation. The scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 10.3**

Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 10.4**

The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance

is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 10.5**

A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 10.6**

Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns.

**Western Forest Products:**

Insufficient Information.

**FSC Criteria 10.7**

Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.

**Western Forest Products:**

Insufficient Information.

***FSC Criteria 10.8***

Appropriate to the scale and diversity of the operation, monitoring of plantations shall include regular assessment of potential on-site and off-site ecological and social impacts, (e.g. natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in principles 8, 6 and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.

***Western Forest Products:***

**Insufficient Information.**

## DISCUSSION AND CONCLUSIONS

This document compares and contrasts Western Forest Products (WFP) forestry practices with Generic Forest Stewardship Council Principles and Criteria (FSC P&C), the Generic Societe Generale de Surveillance Forestry Checklist (SGS P&C), the Scientific Panel for Sustainable Forest Practices in Clayoquot Sound (CSSP) and the Silva Forest Foundation Standards For Ecologically Responsible Timber Management (SFF).

The assessment finds that WFP logging plans are seriously in non-conformance with 22 individual FSC Criteria, are in less serious non-conformance with 8 Criteria, and are in conformance with only 2 Criteria, using five-year development plans (FDP's), Silviculture Prescriptions (SP's), scientific, government, and other reports, correspondence among various stakeholders, interviews with WFP/MOF staff and environmentalists, and other criteria. Additionally, WFP plans are inferior to the Clayoquot Sound Scientific Panel Forest Practices Standards as well as the Silva Forest Foundation Standards For Ecologically Responsible Timber Management. The information required to adequately address WFP's conformance or non-conformance with 20 of the FSC Criteria was not available.

WFP's performance standards must be raised to include stronger conservation, relevant consultation with first Nations, more diverse socio-economics, and better maintenance of ancient rainforest ecosystems and their biodiversity as conditions for certification. Globally rare and endangered ancient rainforest ecosystems will be destroyed, severe threats to biodiversity of fish, wildlife, and other species are eminent, and protected areas are inadequate to maintain the primary forests within WFP operating areas. WFP certification is doubtful in our opinion without significant changes in logging practices, amount of cut, and changes to reforestation practices.

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## APPENDIX 1

### Forests Certified by FSC-Accredited Certification Bodies

as of August 1998

Total Forest Area Certified: 10,518,381 hectares

#### COUNTRY

Company, Location, Size of holding (ha), Plantation vs. Natural Forest, Certification Body.

#### BELGIUM

- Zoniënwood, Groenendaal, 2452ha. Government. Plantation/Natural. Soil Association.
- Heverleebos, Leuven, 4684ha. Government. Plantation/Natural. Soil Association.
- Meerdaalwood, Leuven, 3146ha. Government. Plantation/Natural. Soil Association.

#### BELIZE

- Programme for Belize. 95,800ha. Natural. Rainforest Alliance.

#### BOLIVIA

- Central Intercommunal Campesina del Oriente de Lomerio (CICOL), Santa Cruz. 52,000ha. Natural. Rainforest Alliance.

#### BRAZIL

- Florestex Rio Doce (FRD), Minas Gerais state. 1,734ha. Plantation. SGS.
- Eucatex S.A., Salto and Botucatu region. 29,340ha. Plantation. SCS.
- Duratex S.A., Botucatu, Lencois Paulistas and Agudos region. 47,904ha. Plantation. SCS.
- Floresteca Agroflorestal Ltda, 3,000ha. Plantation. SGS Forestry.
- Mil Madeireira Itacoatiara Ltd., Itacoatiara District, Amazonas. 80,571ha. Rainforest Alliance.

#### CANADA

- Haliburton Forest and Wildlife Reserve. 19,184ha. Natural. Rainforest Alliance.

#### COSTA RICA

- Portico S.A. 3,900ha. Natural. SCS.
- FUNDECOR. 14,928.7ha. Group Certification. Plantation/Natural. SGS.
- Flor y Fauna, S.A. 2,788ha. Plantation. Rainforest Alliance.
- Fundación TUVA. 500 ha. Natural. Rainforest Alliance.
- Tropical American Tree Farms. 1 380ha. Plantation. Rainforest Alliance.

#### CZECH REPUBLIC

- Masaryk Forest, Krtiny. 10,441ha. Natural. Soil Association.

#### GERMANY

- Umweltbehörde Hamburg.Governmental. 4,938ha. Plantation/Natural. Skal.

#### HONDURAS

- Proyecto Desarrollo Bosque Latifoliado (Broadleaf forest Development Project), La Ceiba. 12 certified communities. 25,000ha. Natural. Rainforest Alliance.
- Cooperativa Agroforestal Colon, Atlantida. 7,970ha. Group Certification. Natural. Rainforest Alliance.

#### ITALY

- Magnifica Comunita' di Fiemme ASL (MSF ASL), Val di Fiemme. 11,000ha. Natural. SGS.

#### MALAYSIA

- Deramakot Forest Reserve, Sandakan, Sabah. 55,000ha. Natural. SGS.

#### MEXICO

- Sociedad de Productores Forestales Ejidales de Quintana Roo, Chetumal, Quintana Roo.
- Four Ejidos (Caoba,Petcacab,Noh Bec,Tres Garantias). 86,215ha. Natural. Rainforest Alliance
- Union de Comunidades Forestales Zapotecas-Chinantecas (UZACHI). Communities Calpulalpam de Mendez, Santiago Comaltapec, la Trinidad Ixtlan and Santiago Xiacui, Oaxaca. 24,996ha. Natural. Rainforest Alliance.
- El ejido colectivo San Juan de Aguinaldos, Durango. 3,000ha. Natural. Rainforest Alliance.
- El ejido colectivo forestal Echeverría de la Sierra, Durango. 3,000ha. Natural. Rainforest Alliance.

#### THE NETHERLANDS

- Koninklijke Houtvesterij Het Loo. 8,058ha. Plantation/natural. Skal.
- Gemeentebossen Ede. 2,044ha. Government. Plantation/natural. Skal.
- Gemeentebossen Arnhem. 1,304ha. Government. Plantation/natural. Skal.
- Gemeente Apeldoorn. 571ha. Government. Plantation/natural. Skal.
- Gemeente Renkum. 283ha. Government. Plantation/natural. Skal.
- Gemeente Lelystad. 465ha. Government. Plantation/natural. Skal.
- Staatsbosbeheer, Regio Flevoland-Overijssel.Government. 18,200ha. Plantation/natural. Skal.
- Staatsbosbeheer, Regio Groningen-Drenthe. 21,714ha. Government. Plantation/natural. Skal.

#### NEW ZEALAND

- Craigpine Timber Ltd., Waitane, Rugged Hills, Castledowns and Wether Hills. 2,305ha. Plantation. SGS.
- Rayonier New Zealand Ltd., South Resources District. 42,720ha. Plantation. SGS.

**PANAMA**

- Futuro Forestal, S.A San Felix, Chiriqui. Panama. 23ha. Plantation. Rainforest Alliance.

**PARAGUAY**

- Yaguarete Forest L.P. 16,000ha. Natural. SGS.

**POLAND**

- Gdansk Regional Directorate of State Forests. 294,000ha. Natural. SGS.
- Katowice Regional Directorate of State Forests. 635,000ha. Natural. SGS.
- Szczecinek Regional Directorate of State Forests. 622,563ha. Natural. SGS.
- Krakow Regional Directorate of State Forests. 173,166ha. Government. Natural. SGS.

**SOLOMON ISLANDS**

- SWIFT with Iriquila Community, North-west Vella Lavella. 200ha. Natural. SGS Forestry.
- SWIFT with Nairobi Community, Sikuni 1 Land. 200ha. Natural. SGS Forestry.
- SWIFT with Ozanga Lavata Milling Project, Karukate, Vangunu Island. 200ha. Natural. SGS Forestry.
- SWIFT with Tomba Tunu Eco-timber project, Tomba Tunu Island. 25ha. Natural. SGS Forestry.
- SWIFT with Avos Kevu (Rove Family), Burape on New Georgia. 38ha. Natural. SGS Forestry.
- SWIFT with Lilihina Project, at Ziata Road, near Makuhae. 8ha. Natural. SGS Forestry.

**SOUTH AFRICA**

- Bracken Timbers, Kwazulu-Natal Province. 4,500ha. Plantation. SGS Forestry.
- SAFCOL, Forest plantations in Kwa-Zulu Natal Province. 51,922ha. Plantation. SGS Forestry.
- SAFCOL, Forest plantations in Mpumalanga South Region. 51,196ha. Plantation. SGS Forestry.
- Soetmelk Boerdery (Edms) Bpk in partnership with African Charcoal, Vaalkop farm. 300ha. Plantation. SGS Forestry.
- Kanhym Landgoed, 7 farms. 602ha. Plantation. SGS Forestry.
- Majuba Hill Farms in partnership with African Charcoal. 1,458ha. Plantation. SGS Forestry.
- SAFCOL, Eastern Cape Region. 42,714ha. Plantation. SGS Forestry.
- Mondi Forests North, Mpumalanga Province. 214,031ha. Plantation. SGS Forestry.
- SAFCOL, West Cape Region. 53,530ha. Plantation. SGS Forestry.
- SAFCOL, Mpumalanga North Region. 64,378ha. Plantation. SGS Forestry.

**SRI LANKA**

- Dipped Products Ltd., Kelani Valley Plantations. 4,582ha. Plantation. SGS Forestry.
- RPK Management Services (Pvt) Ltd., Kegalle Plantations. 5,476ha. Plantation. SGS Forestry.
- Horana Plantations Ltd., Horana Plantations. 2,668ha. Plantation. SGS Forestry.

**SWEDEN**

- AssiDomän Skog & Trä, Värmland & Karlskoga forest management districts. 60,700ha. Natural. SGS Forestry.
- Korsnäs Aktiebolag Skog: Gimo, Ljusdal and Dala Regions. 664,200ha. Natural. SGS Forestry.
- Stora, Ludvika forest management district. 300,000ha. Natural. SCS.
- AssiDomän Skog & Trä, Älvsbyn region. 676,000ha. Natural. SGS Forestry.
- AssiDomän Skog & Trä, Kalix region. Private or industrial. 778,000ha. Natural. SGS Forestry.
- Stora, Mora forest management district. 300,000ha. Natural. SCS.
- Stora, Sveg forest management district. 285,000ha. Natural. SCS.
- Stora, Strömsberg forest management district. 92,000ha. Natural. SCS.
- AssiDomän Lycksele Region, Lycksele Region. 727,000ha. Natural. SGS Forestry.
- AssiDomän Skog & Trä, Värnamo region. 141,000ha. Natural. SGS Forestry.
- AssiDomän Ostersund Region. 180,000ha. Natural. SGS Forestry.
- Skogssällskapet AB, Group Certification. 72,000ha. Natural. Soil Association.
- AssiDomän Skog & Trä AB, Växjö Management Region. 171,000ha. Natural. SGS Forestry.

**SWITZERLAND**

- Solothurn Government. 2,095ha. Natural. SGS Forestry.
- Foundation Rollirain. 17ha. Natural. IMO 17

**UNITED KINGDOM**

- Dartington Hall Trust, Dartington Home Woods, Devon, England. 92ha. Plantation/Natural. Soil Association.
- Dyfed Wildlife Trust, Pengelli Forest, Dyfed, Wales. 65ha. Natural. Soil Association.
- Duchy of Cornwall, Cornwall, England. 1,004ha. Plantation/Natural. Soil Association.
- National Trust, Hatfield Forest, Essex, England. 240ha. Plantation/Natural. Soil Association.
- Camphill Village Trust, Oaklands Park, Gloucestershire, England. 13ha. Natural. Soil Association.
- Bioregional Charcoal Company Limited (group certification of 21 woodlands in Britain). 2,037ha. Plantation/Natural. SGS Forestry.

- Big K Charcoal Merchants Limited (group certification of Shadwell Estate, Thompson Common, Foxley Wood, Hoe Rough and Scales Park State). 862ha. Plantation/Natural. Soil Association.
- Elveden Farms Ltd. Norfolk. 1,600ha. Plantation/Natural. Soil Association.
- Plashett Wood, Sussex. 150ha. Plantation/Natural. Soil Association.
- Coed Cymru, Wales. 140ha. Group Certification. Natural. SGS Forestry
- Wrekin District Council. United Kingdom. Government. 452ha. Plantation/Natural. Soil Association.

#### UNITED STATES

- Big Creek Lumber Company, Santa Cruz County, California. 2,720ha. Natural. SCS.
- Collins Pine Company, Collins Amanor Forest, Chester county, CA. 37,600ha. Natural. SCS.
- Edward A. Tunheim, Resource Manager. Santa Cruz, California. 8,094ha. Plantation. Private. Rainforest Alliance.
- Darcie Mahoney, California. Resource Manager. 353ha. Natural. Rainforest alliance.
- Blencowe Managed Forest Lands, North Coast, California. 4,878ha. Natural. Rainforest Alliance.
- Kane Hardwood Division of Collins Pine Company, Kane, Pennsylvania. 46,400ha. Natural. SCS.
- Keweenaw Land Association, Ironwood, Michigan. 63,000ha. Natural. Rainforest Alliance.
- McClellan Mountain Ranch, Bridgeville, CA. 133ha. Natural. Rainforest Alliance.
- Menominee Tribal Enterprises, Keshena, Wisconsin. 95,122ha. Natural. SCS and Rainforest Alliance.
- Seven Islands Land Company, Pingree Family Forest, Bangor, Maine. 390,000ha. Natural. SCS.
- Tree Shepherd Woods, Thurston County, Washington. 8ha. Natural. Rainforest Alliance.
- Two Trees Forestry, Coopers Mills, Maine. 3,572ha. Natural. Rainforest Alliance.
- Northeast Ecologically Sustainable Timber, Dover, New Hampshire. 1,366ha. Natural. Rainforest Alliance.
- Wylatti Timber Management company, Ltd., Mendocino County, California. 365ha. Natural. Rainforest Alliance.
- Our Lady of the Redwoods Abby, Inc. Whitethorn, California. 163ha. Natural. Rainforest Alliance.
- Surface Road Associates, Seattle, Washington. 12ha. Natural. Rainforest Alliance.
- Metropolitan District Commission's Quabbin Reservoir Lands, Massachusetts. Government. 23,577ha. Natural. Rainforest Alliance.
- Red Hills Lumber, Boston, Massachusetts. 2,945ha. Natural. Rainforest Alliance.
- SW-FM-025 Individual Tree Selection Management, Inc., Portland, Oregon. 2,042ha. Natural. Rainforest Alliance.
- Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry. Pennsylvania. Government. 485,615ha. Natural. SCS.
- Minnesota Aitkin County Land Department. Government. 89,876ha. Natural. Rainforest Alliance.
- Minnesota Department of Natural Resources, Division of Forestry Management of State Lands in Aitkin County. Government. 146,719ha. Natural. Rainforest Alliance.
- Collins Lakeview Forest, Oregon. 29,150ha. Plantation/natural. SCS.
- Maine Forestry, Maine. 1,402ha. Group certification. Plantation. SCS.
- The Brown Tract, Oregon. 110ha. Natural and Plantation. Rainforest Alliance.
- The Kan Property. California. 17ha. Natural. Rainforest Alliance.
- The Krantz-Kahan Property. Whitehorn, California. 24ha. Natural. Rainforest Alliance.
- Randy Jacobszoon. California Resource manager. 1,545ha. Natural. Rainforest Alliance.
- Arcata City Forest. California. Government. 486ha. Natural Forest. Rainforest Alliance.
- Still Waters Farm. Shelton, Washington. 60ha. Natural. Rainforest Alliance.
- Ecoforestry Management Associates. Oregon. Resource Manager. 142ha. Natural. Rainforest Alliance.
- Ecoforestry Institute. Oregon. 170ha. Natural. Rainforest Alliance.
- Forest, Soil and Water. California. Resource Manager. 182ha. Natural. Rainforest Alliance.
- Vermont Family Forests. Middlebury. Vermont. 2,666ha. Resource Manager. Natural. Rainforest Alliance.

#### ZAMBIA

- Muzama Crafts Ltd. 1,273,700ha. Natural. Soil Association.

#### ZIMBABWE

- Durawood Products, Pumula Protected Woodland, Matabele land North. 24,850ha. Natural. SGS Forestry.

Source: <http://www.fscoax.org/frameneg.html>

**APPENDIX 2****List of SGS Technical Committee for WFP assessment standard**

*Hammish Kimmins*, Faculty of Forestry, University of British Columbia

*George Watts*, Imhahup Consulting Group, BC

*Bryan Evans*, Dovetail Consulting, BC

*Ilan Vertinski*, Faculty of Forestry, University of British Columbia, BC

*Neid Judd*, SGS Qualifor, Oxford, England

## APPENDIX 3

### FSC ANALYSIS

**The FSC provides the following introduction of its purpose and intent:**

“It is widely accepted that forest resources and associated lands should be managed to meet the social, economic, ecological, cultural and spiritual needs of present and future generations. Furthermore, growing public awareness of forest destruction and degradation has led consumers to demand that their purchases of wood and other forest products will not contribute to this destruction but rather help to secure forest resources for the future. In response to these demands, certification and self-certification programs of wood products have proliferated in the marketplace.

The Forest Stewardship Council (FSC) is an international body which accredits certification organizations in order to guarantee the authenticity of their claims. In all cases the process of certification will be initiated voluntarily by forest owners and managers who request the services of a certification organization. The goal of the FSC is to promote environmentally responsible, socially beneficial and economically viable management of the world’s forests, by establishing a worldwide standard of recognized and respected Principles of Forest Management.

The FSC’s Principles and Criteria (P&C) apply to all tropical, temperate and boreal forests, as addressed in Principle #9 and the accompanying glossary. Many of these P&C apply also to plantations and partially replanted forests. More detailed standards for these and other vegetation types may be prepared at national and local levels. The P&C are to be incorporated into the evaluation systems and standards of all certification organizations seeking accreditation by the FSC. While the P&C are mainly designed for forests managed for the production of wood products, they are also relevant, to varying degrees, to forests managed for non-timber products and other services. The P&C are a complete package to be considered as a whole, and their sequence does not represent an ordering of priority. This document shall be used in conjunction with the FSC’s Statutes, Procedures for Accreditation and Guidelines for Certifiers.

FSC and FSC-accredited certification organizations will not insist on perfection in satisfying the P&C. However, major failures in any individual Principles will normally disqualify a candidate from certification, or will lead to decertification. These decisions will be taken by individual certifiers, and guided by the extent to which each Criterion is satisfied, and by the importance and consequences of failures. Some flexibility will be allowed to cope with local circumstances.

The FSC recognizes that there is a continuum of forest management intensity and resulting forest condition. This continuum includes primary, undisturbed natural forest, (with all or most of the characteristics and functions of the natural forest ecosystem), well-developed secondary and semi-natural forests (with many or some of the characteristics and functions of the natural forest ecosystem), and plantations (with few or no characteristics of the natural forest ecosystem). The decision to categorize and evaluate a managed forest (a management regime applied to a specific forest type) as a “natural forest” or as a “plantation” must be made at a local level, and should be guided by clearly articulated FSC-endorsed regional standards, when such standards exist. These standards may include further conditions and restrictions on plantation management. The FSC also recognizes differences between plantations of exotic species and those of native species. Plantations composed of exotic species inherently pose more risks than those of native species, and will require additional ecological and social safeguards. These safeguards are to be articulated in FSC regional standards. In order to be considered for certification, all forests, including plantations, must meet Principles and Criteria 1 through 9. Plantations, however, must also satisfy Principle 10 and its Criteria.

The scale and intensity of forest management operations, the uniqueness of the affected resources, and the relative ecological fragility of the forest will be considered in all certification assessments. Differences and difficulties of interpretation of the P&C will be addressed in national and local forest management standards. These standards are to be developed in each country or region involved, and will be evaluated for purposes of certification, by certifiers and other involved and affected parties on a case by case basis. If necessary, FSC dispute resolution mechanisms may also be called upon during the course of assessment. More information and guidance about the certification and accreditation process is included in the FSC Statutes, Accreditation Procedures, and Guidelines for Certifiers.

The FSC P&C should be used in conjunction with national and international laws and regulations. FSC intends to complement, not supplant, other initiatives that support responsible forest management worldwide.

The FSC will conduct educational activities to increase public awareness of the importance of the following: 1) improving forest management; 2) incorporating the full costs of management and production into the price of forest products; 3) promoting the highest and best use of forest resources; 4) reducing damage and waste; and 5) avoiding over-consumption and over-harvesting. The FSC will also provide guidance to policy makers on these issues, including improving forest management legislation and policies.”

## APPENDIX 4

**Letter from Hereditary Chiefs****HEILTSUK CHIEFS TELL WESTERN FOREST PRODUCTS TO “DEFER LOGGING OUR LAND”**

In early April, 70 Heiltsuk representatives sailed to Ingram-Mooto to request that Western Forest Products immediately stop logging the Ingram-Mooto. With support from the community, the Hemas Council of hereditary chiefs asked for a one year deferral on all new logging in Heiltsuk territory to allow the community to make informed decisions and develop sustainable short and long term plans for all logging activities in their homeland. Although WFP stopped temporarily, they sent the road building crew in after 10 days without consultation with the community. Since then WFP has continued road building and plans to log the pristine valleys using conventional clearcutting despite concerns of the Hemas Council.

“We have watched our resources and economic opportunities being taken away and yet we depend on these for our food and survival. Our salmon, abalone, halibut, cod, sea cucumbers and now our trees are being removed,” said Hemas spokesperson Harvey Humchitt. The Heiltsuk have been here since time began and will remain here until it ends. “We want the logging of the Ingram-Mooto and all removal of resources to stop until we can have a voice in determining what happens in our homeland. We owe this to our future generations and to the land and sea which provide for us. We want the logging of old growth to stop for the sake of all British Columbians.”

Western Forest Products is one of the largest logging companies which operate in Heiltsuk territory. They remove huge amounts of timber every year and yet provide only a few jobs for the Heiltsuk people. Recently, WFP stated their wish to become certified as being an environmentally and socially responsible logging company under the Forest Stewardship Council. However, the FSC clearly states that, “indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.” The hereditary chiefs sent a letter to the FSC protesting WFP’s activities.

“We do not support the clearcutting of old growth in Ingram-Mooto. This is wrong,” said Chief Harvey Humchitt, “WFP is ignoring our request for a one-year deferral even though the Delgamuukw and Gladstone cases acknowledge that First Nation people have the right to financially share in the benefits of development in their homelands.”

“We are not against logging—we support sustainable development which doesn’t destroy the delicate balance and interconnectedness of life,” said Chief Humchitt. “In the past, our voices were unheard—we are now exercising our responsibility to be stewards of this land. Our ancestors made decisions which all British Columbians now benefit from. We owe this to future generations for the sake of our common good.”

The ancient forest stands have been here for thousands of years—one year is a small fraction to review all options.

## APPENDIX 5

**Contact Information****1. SGS****2.1 SGS Qualifor**

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**2. Forest Stewardship Council (FSC)****2.1 FSC Secretariat.**

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**4. Other FSC-Accredited Certifiers**

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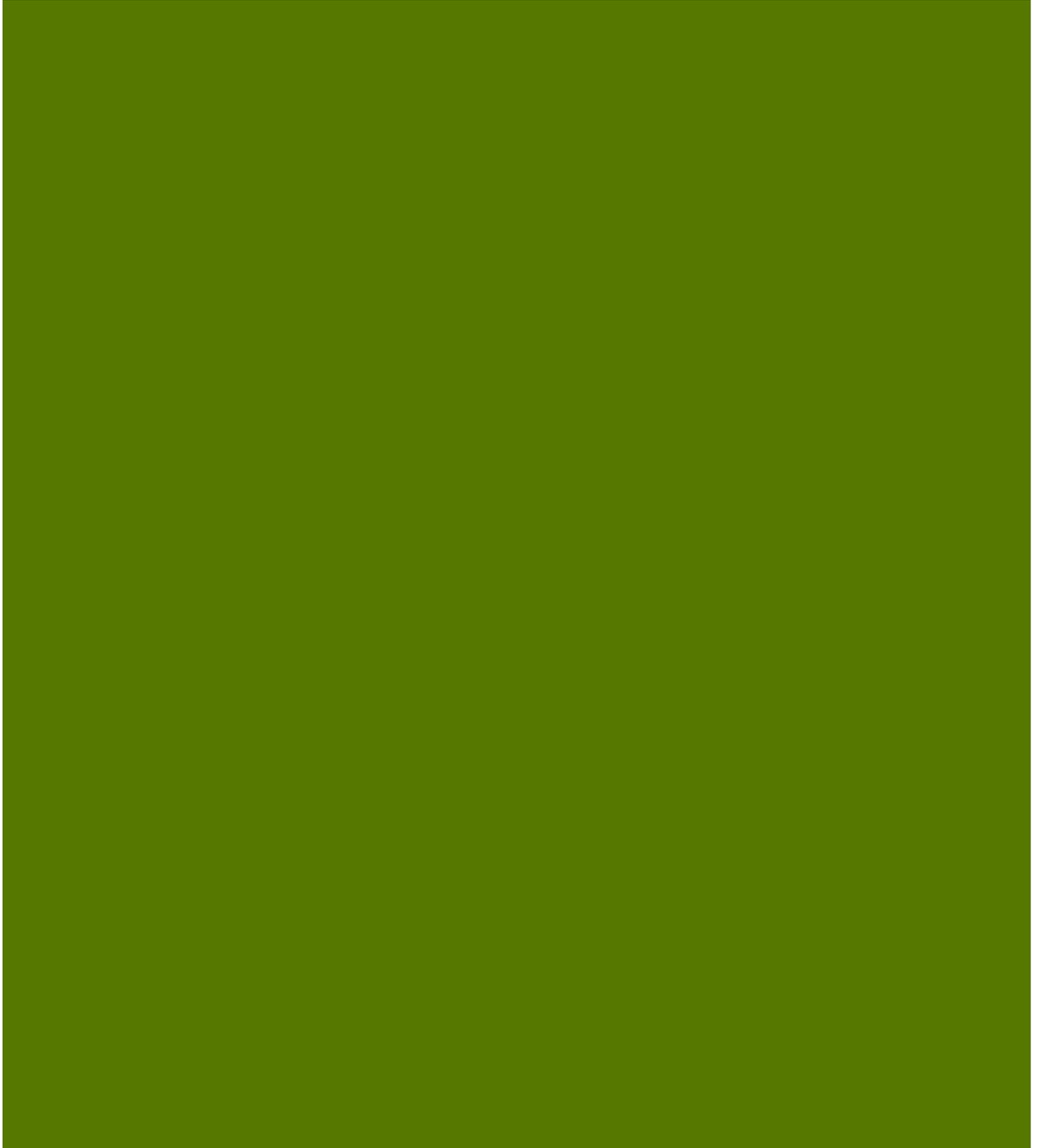
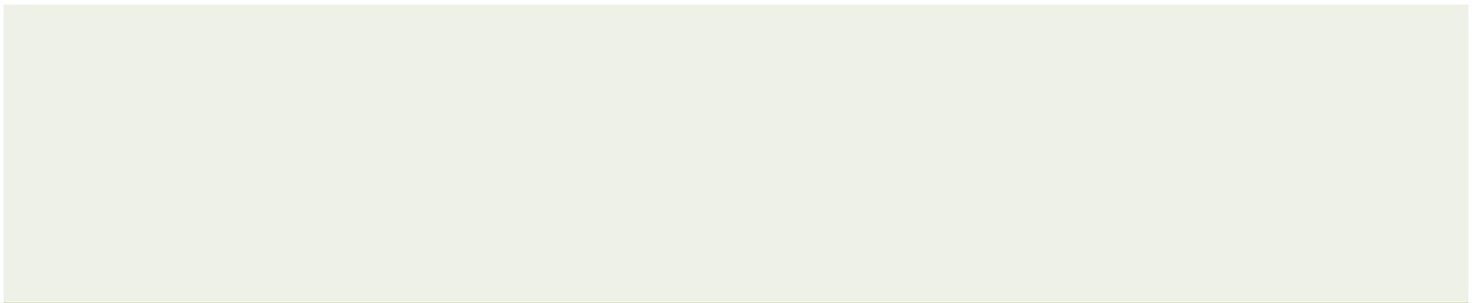
*Jan-Willem Heezen*  
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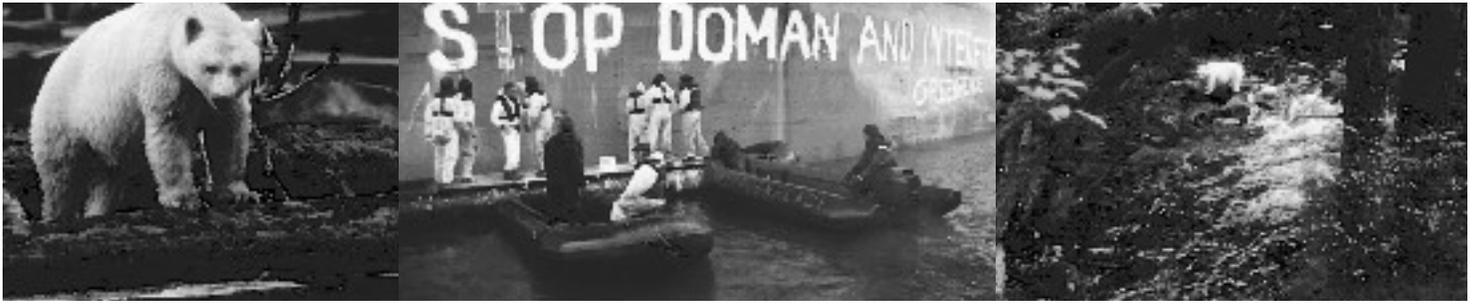
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Website: <http://www.silvafor.org>





The Kermode, or Spirit Bear, is a rare subspecies of black bear found in an area of Canada's rainforest where WFP has licenses to log. One out of every 10 black bears in this area are born with this unusual white colouration. (McAllister)

International protest against Doman Industries, parent company of WFP, for continuing to clearcut Canada's rainforest valleys.

(GPI/Berghezani)

**Greenpeace**

*Founded in Canada, 1971*

*Fondé au Canada, 1971*

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