



April 27, 2007

Protected Areas and FSC Certification Memo

Re: Company performance relative to FSC Indicator 6.4 of the Canadian National Boreal Standard and Corrective Action Requests (Conditions) for current certified forests in the boreal forest region of Canada

To Whom It May Concern:

Attached for your interest is a compilation of Corrective Action Requests (conditions) applied by auditors in previous assessments of FSC Indicator 6.4 in Canada's boreal forest. Where the data was available, we have also included estimates of the extent of existing protection in the FMA, the extent of additional candidate protected areas identified to meet Indicator 6.4, and the resulting total area of safe-guarded forest.¹

Conditions have been applied in thirteen of fifteen cases. It appears that there is some inconsistency in the stringency of conditions applied, with assessments in Quebec making less demands for the identification of additional protected areas (including no conditions), even in forests with relatively low amounts of protection. Generally, strong conditions have been applied that require further assessment, the identification and safe-guarding of candidate protected areas and promoting these candidates with government.

The following list shows the types of conditions applied, in order of their frequency of application:

- Complete gap analysis (8 occurrences)
- Approach government with proposals for permanent protection (6 occurrences)
- Conduct further consultation (5 occurrences)
- Identify and protect additional areas based on gap analysis (4 occurrences)
- Exclude candidate protected areas from the allowable harvest calculation (3 occurrences)
- Subject the results to review (3 occurrences)
- Consult with First Nations (2 occurrences)
- Document progress toward permanent protection of candidate protected areas (1 occurrence)

We hope that this information is of some informative value to you. We will also be forwarding this information to other interested stakeholders with the aim of promoting discussion on consistent approaches to this indicator.

¹ Estimates of the amount of existing protected areas and FSC candidate protected areas was obtained from World Wildlife Fund Canada, which partnered with the certified companies in identifying candidate protected areas to satisfy FSC Indicator 6.4. Estimates of existing protected areas are also included from the public summaries of certified forests that reported on this. In most cases differences in estimates are small.



If you have any questions regarding this memo, please contact Chris Henschel, consultant to CPAWS at chrishenschel@gmail.com or (416) 897-4887.

Sincerely,

A handwritten signature in black ink that reads 'Aran O'Carroll'.

Aran O'Carroll, LL.B.
National Forests Program Manager
Canadian Parks and Wilderness Society

Canadian Parks and Wilderness Society
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[enclosure : Company performance relative to FSC Indicator 6.4 of the Canadian National Boreal Standard and Corrective Action Requests (Conditions) for current certified forests in the boreal forest region of Canada FSC-certified forests in the boreal forest of Canada]



Company performance relative to FSC Indicator 6.4 of the Canadian National Boreal Standard and Corrective Action Requests (Conditions) for current certified forests in the boreal forest region of Canada FSC-certified forests in the boreal forest of Canada.²

FSC Certified Forest	Existing Protected Areas	FSC Candidate Protected Areas	Total Protected Areas	Conditions as reported by the certifier in Public Summaries
Alberta Pacific Forest Industries Inc. (ALPAC) (SW-FM/COC-1626)	40,670 ha 0.71 % of FMA Estimate from SmartWood public summary: 22,604 ha 4.06% of FMA	201,660 ha 3.53% of FMA	242,330 ha 4.24% of FMA	<p>“Condition 6.4a: By the end of Year 1 of certification, Al-Pac shall obtain an independent review of the draft Gap Analysis and the relative effectiveness of the options laid out within the document for achieving effective ecosystem representation, with a specific focus on addressing the effectiveness of representation for ecosystems found within the Athabasca and Clearwater river valleys.</p> <p>Condition 6.4b: By the end of Year 1 of certification, Al-Pac shall document progress in terms of permanent protection of ecological benchmark areas within the Al-Pac FMA area. Al-Pac shall have worked with the provincial government, First Nations, the forest and energy industries and ENGO’s to achieve the protection of the Gypsy-Gordon, Athabasca Rapids and Lakeland deferral areas.</p> <p>Condition 6.4c: By the end of Year 2 of certification, if the results of the independent review of the Gap Analysis show ineffective representation, based on</p>

² Estimates of the amount of existing protected areas and FSC candidate protected areas was obtained from World Wildlife Fund Canada, which partnered with the certified companies in identifying candidate protected areas to satisfy FSC Indicator 6.4. Estimates of existing protected areas are also included from the public summaries of certified forests that reported on this. In most cases differences in estimates are small.

				further consultation with stakeholders (e.g. NGOs, other quota holders and government), Al-Pac shall develop a strategy to achieve more effective ecosystem representation within the FMA.”
Algoma Forest (SW-FM/COC-1550)	81,582 ha 9.51% of FMA Estimate from SmartWood public summary: 147,221 ha 15.48% of FMA	Unknown	Unknown	“Condition 6.4: By the end of year three of certification, Clergue shall have initiated formal discussions with First Nations, ENGO’s and other stakeholders to identify gaps in protected area representation, and have approached the provincial government with proposals or options to complete the protected areas network on the Algoma Forest.”
Domtar Inc. - Spanish Forest (SW-FM/COC-2002)	138,072 ha 10.97% of FMA Estimate from SmartWood public summary: 134,110 ha 10.92% of FMA	20,329 ha 1.62% of FMA	158,401 ha 12.59% of FMA	“CAR 11/06: By the year 2 annual audit, Domtar shall have continued working with ENGO’s, other stakeholders and First Nations to identify gaps in protected area representation, and in concert with those groups, shall have approached the provincial government with proposals or options to complete the network of protected areas.
Domtar Inc., Pineland Forest (SW-FM/COC-1599)	19,115 ha 4.81% of FMA Estimate from SmartWood public summary: 16,192 ha	32,695 ha 8.22% of FMA	51,810 ha 13.03% of FMA	“Condition 6.4: By the end of Year 2 of certification, Domtar shall have continued working with ENGO’s, other stakeholders and First Nations to identify gaps in protected areas representation, and, in concert with those groups, shall have approached the provincial government with proposals or options to complete the network of protected areas.”

	4.11% of FMA			
Domtar Inc. (SGS-FM/COC-2414) (Val D'Or)	1,248 ha 0.10% of FMA	67,196 ha 5.48% of FMA	123,74 ha 10.09% of FMA	<p>Strength: “Domtar associated itself with the WWF to conduct a gap analysis that made it possible to propose two new protected areas, in addition to those mentioned above (see their description at indicator 6.4.2). This constructive attitude regarding the development of a true network of protected areas on the territory ought to be emphasized as strength on the part of the applicant.”</p> <p>Weakness: “A very small proportion of the common area is presently under across-the-board protection: only the Caribou-de-Jourdan ecological reserve (712 hectares) south of Val-d’Or, the Dunesde-la-Moraine-d’Harricana ecological reserve (536 hectares) on the north shore of the Descelles reservoir and an exceptional forest ecosystem (Lac la Loche 2,419 ha). There are, nevertheless, several areas under consideration that are being created as biodiversity reserves: Lac Lemoine (9,457 ha), Lac Sabourin (52,144 ha)”</p> <p>“Domtar globally complies to this criterion.”</p> <p>No Conditions/CARs</p>
Northshore Forest Inc. (SW-FM/COC-1544)	149,237 ha 13.00% of FMA Estimate from SmartWood	Unknown	Unknown	“Condition 6.4: By the end of Year 3 of certification, NFI shall have worked with ENGOs, other stakeholders and First Nations to identify gaps in the protected area representation and shall lead the process of approaching the provincial government with

	public summary: 151,904 ha 12.15% of FMA			proposals or options to complete the network of protected areas.”
Produits forestiers Temrex (SW- FM/COC-2035)	810 ha 0.22% of FMA Estimate from SmartWood public summary: 810 ha 0.22% of FMA	16,646 ha 4.59% of FMA	17,456 ha 4.81% of FMA	“The proposed protected areas were not excluded from the calculation of the current annual allowable cut and were not subject to a peer review.” “CAR #: 17/05 Temrex shall submit its gap analysis to a peer review and take the steps necessary with the MRNF to exclude candidate protected areas from the calculation of the AAC.”
Tembec – Gestion des ressources forestières – Foresterie Abitibi O. (Rouyn) (SW- FM/COC-2038)	26,830 ha 6.40% of FMA	60,900 ha 14.52% of FMA	87,730 ha 20.92% of FMA	"Tembec has proposed significant area as protected areas." No Conditions/CARs
Tembec Industries Inc. - Gestion des ressources forestières - Foresterie Témiscamingue (SW-FM/COC- 1928)	1,965 ha 0.18% of FMA	59,402 ha 5.41% of FMA	61,367 ha 5.59% of FMA	“The proposed protected areas have been excluded from the management plan but not from the current AAC calculation, and the proposal has not been peer-reviewed.” “CAR #: 15/05: Tembec shall submit its gap analysis to peer review and undertake discussions with MRNF to exclude candidate protected areas from AAC calculation.”
Tembec Industries	153,350 ha	138,712 ha	292,062 ha	“Condition 16: For the next FMP cycle Tembec shall

Inc. - Gordon Cosens Forest (SW-FM/COC-241)	7.61% of FMA	6.88% of FMA	14.49% of FMA	ensure that a gap analysis is completed and any identified candidate protected areas are deferred or excluded from harvesting and infrastructure development. Tembec must encourage effective involvement of First Nations in the process.”
Tembec Industries Inc. - Superior Forest (SW-FM/COC-1749)	123,442 ha 13.13% of FMA Estimate from SmartWood public summary: 101,530 ha 13% of FMA	Unknown	Unknown	“Condition 6.4.1: By the end of Year 2 of certification, Tembec shall use a peer-reviewed scientific gap analysis to identify and map potential candidate protected areas with partial or no representation in existing protected areas.” “Condition 6.4.3: By the end of Year 3 of certification, Tembec shall have continued consultation with interested parties and shall have approached the provincial government with a proposal to complete the network of protected areas.”
Tembec Industries Inc. – Forest Resource Management Abitibi - Forest Management Units (La Sarre) 85-51 and 85-62 (SW-FM/COC-1582)	49,535 ha 3.85% of FMA	94,343 ha 7.34% of FMA	159,663 12.42% of FMA	“Good global strategy relative to conservation areas and HCVPs.” “Condition 6.4: Upon receiving the final report, Tembec will document its discussions with First Nations on the topic of protected areas.”
Tembec Industries Inc. - Romeo Malette Forest (SW-FM/COC-	21,780 ha 3.42% of FMA Estimate from	42,302 ha 6.64% of FMA	64,082 ha 10.06% of FMA	“Condition 6.4: By the end of Year 2 of certification, Tembec shall have completed the peer review of the protected areas gap analysis, and shall have approached the government and discussed the completion of the

1366)	SmartWood public summary: 22,694 ha 3.61% of FMA			protected areas with other stakeholders and First Nations.”
Tembec Industries Inc., Smooth Rock Falls Forest (SW-FM/COC-1462)	22,460 ha 4.45% of FMA Estimate from SmartWood public summary: 26,001 ha 4.87% of FMA	78,558 ha 15.56% of FMA	101,018 ha 20.01% of FMA	“Condition 6.4: By the end of Year 1 of certification, Tembec shall have taken steps necessary to complete the gap analysis including independent peer review and shall have approached the government regarding the appropriate representation targets.”
Nipissing Forest (SCS-FM/COC-00055N)	83,079 ha 7.46% of FMA	Unknown	Unknown	“CAR 2003.8: In the absence of the province completing its network of representative protected areas, NFRM must, within one year from award of certification, take necessary steps to engage in the candidate selection process. It is recommended that the process uses the Room to Grow report as a reference and includes: identification of candidate areas; delineation of candidate areas on maps; strategies and timelines; and, removal of the candidate protected areas from the landbase for the 2009 Plan. It is not necessary for NFRM to recalculate the AHA for the 2004 Plan, however, the 2009 Plan must be adjusted accordingly.”