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**AN ENVIRONMENTALIST AND FIRST NATIONS RESPONSE  
TO THE CANADIAN STANDARDS ASSOCIATION  
PROPOSED CERTIFICATION SYSTEM  
FOR SUSTAINABLE FOREST MANAGEMENT**

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# **AN ENVIRONMENTALIST AND FIRST NATIONS RESPONSE TO THE CANADIAN STANDARDS ASSOCIATION PROPOSED CERTIFICATION SYSTEM FOR SUSTAINABLE FOREST MANAGEMENT**

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## **INTRODUCTION**

The Canadian Standards Association (CSA) is a private sector agency that certifies products as market-worthy. Through the governmental Canadian Standards Council, it is part of the international network, the International Standards Organization (ISO). The object of the ISO is to promote the development of international standards, and so to facilitate international trade.

For the past 18 months, the CSA has been working on standards for the certification of companies for sustainable forest management (SFM) in Canada. This project has been sponsored and funded by the Sustainable Forestry Certification Coalition comprised of the pulp and paper industry, lumber producers, and strand board producers. The Government of Canada and representatives of provincial governments also support the process.

This Discussion Paper reflects the views of those First Nations and member groups (listed below) of the Forest Caucus of the Canadian Environmental Network who have reviewed current drafts of the relevant CSA documents. The groups share a commitment to the environmental sustainability of Canadian forests.

## **HOW THE CSA SUSTAINABLE FORESTRY MANAGEMENT CERTIFICATION SYSTEM WOULD WORK**

A company will be entitled to SFM certification if it develops a system with the following six "essential elements": (p. 18)

1. **Commitment:** The company must make a commitment to sustainable forestry management and to continual improvement in its performance. This may be achieved by developing mission and vision statements, policy statements, and guiding principles for organizing action.
2. **Public participation:** The company must provide for public participation throughout the planning and development of a proposal for forest use while making it "clear to all participants from the beginning that the final decision rests with the forest manager or owner." (p.24)
3. **Planning:** The company shall review its current position; review the applicable

law; consider environmental risks and liabilities; consider the criteria and indicators of sustainability (listed below); develop forecasts, choose a scenario; set objectives; and finalize an implementation plan.

4. **Implementation:** The company must establish that field-level actions are subject to sufficient control, documentation, and reporting to implement the chosen plan.
5. **Measure and assess:** The company shall assess the effects of its management actions on the various criteria and indicators of sustainability.
6. **Review and improve:** The SFM system should be continually monitored and updated to deliver the objectives of the company. The company must commit to "continual improvement" in the SFM system.

#### PURPOSE OF THE CSA SFM CERTIFICATION SCHEME

The CSA process is occurring within a global context of opposition from international business to governmental regulation. Continuing de-regulation is at the top of the agenda of the Organization of Economic Co-operation and Development (OECD). The CSA has already sent its SFM system to the International Standards Organization as a new work item proposal, stating that:

trade in forest products would be greatly aided by the development of an international standard for SFM. (CSA New Work Item proposal to ISO Congress, Oslo, June 1995)

The CSA is concerned that if Canada does not develop standards for sustainable forestry, it may be necessary to "accept standards derived by groups that do not specifically consider Canada's interests." (p.6)

A senior government official noted recently that companies that certify their forests under SFM will certainly use the certificate to sell their products. Already, an Ontario government poster campaign in April 1995 depicted a mock-up CSA eco-label stamped on a piece of lumber produced in Ontario.

In our view, the purpose of the SFM scheme is to further the export of Canadian forest products, not to protect Canadian forests. It is an industry reaction to successful boycott campaigns against Canadian forest products, and an attempt to prevent future ones through development of an international stamp of approval for current forest practices.

Unfortunately, the scheme will not require actual sustainable management, and will deliver an eco-label for forest products that is not credible. It will not be marketable to an

increasingly informed and concerned domestic and international audience.

### CERTIFICATION OF MANAGEMENT SYSTEMS, NOT ON-GROUND PERFORMANCE

The fundamental deficiency of the CSA SFM system is that it only requires that a company set objectives for itself, and then develop a management and control system capable of delivering the objectives. It certifies a management structure, not on-ground performance of environmental protection. A forest could be certified as sustainably managed if the right steps are being followed, regardless of the condition of the forest ecosystem, wildlife, indigenous communities, etc.

The SFM scheme establishes no mandatory measurable indicators of sustainable forest management; companies should consider the criteria and indicators listed, but need not apply them. Company objectives may continue to include liquidation of specific species, excessively high logging levels, clear cutting, including large area clear cuts, pesticide spraying, inattention to regeneration, and destruction of non-timber values.

A system that fails to measure on-ground performance will be useless in encouraging improved environmental performance. This scheme will actually discourage improvement, since a company that sets high standards for its practices will have more difficulty obtaining certification than one that sets lower standards (objectives) for itself.

The expense of establishing the management system envisioned by the CSA will favour large corporations over smaller operators, including smaller operations whose logging methods and forest operations are sometimes preferable and more sustainable. They may lack the infrastructure required to go through the process for certification.

In addition to requiring that measurable criteria and indicators be used, a credible standard must clearly state that maintenance of biological sustainability is the paramount goal of forest management, and that maintenance of the natural forest is the only way to ensure the delivery of continued ecological and economic benefits.

### CSA SFM CRITERIA AND INDICATORS

The criteria to be considered in planning for sustainable forest management, according to the CSA, are: conservation of biological diversity; maintenance and enhancement of forest ecosystem conditions and productivity; physical environmental factors; forest ecosystem contributions to ecological cycles; productive capacity; and accepting society's responsibility for sustainable development.

The criteria are to be considered with a list of "indicators" of sustainability, including some which do address important aspects of performance measurement.

However, as noted above, both criteria and indicators need only be considered in forest planning; no mandatory measurable levels of achievement are required to obtain certification.

Forest protection is not advanced by allowing companies to evade their responsibility by relying on the last criterion: "accepting society's responsibility for sustainable development." Clearly, those who extract benefits from the forest and create the greatest environmental impacts on it have the greatest responsibility for ensuring its sustainability.

This criterion appears to be a grab-bag of diverse issues, including "sustainability of forest communities," "fair and effective decision-making," "informed decision-making," and "participation by aboriginal communities in sustainable forest management."

### CRITERIA AND INDICATORS RELATED TO FIRST NATIONS RIGHTS

We have a particular concern with the relegation of First Nations interests to incidental treatment, and to the CSA's disclaimer:

The language in this section is without prejudice to any present or future Aboriginal land claims resolution or land-use issues. (p.53)

The CSA has failed to incorporate the sustainability criterion proposed by the National Aboriginal Forestry Association (NAFA), namely:

Sustainable forest management or development activities respect and provide for constitutionally recognized Aboriginal and Treaty Rights. (NAFA Position Paper on an Aboriginal Criterion for Sustainable Forest Management; March 1995)

The Association also specified indicators to measure the implementation of this criterion:

1. Aboriginal participation in decision-making and forest management planning;
2. Mutual learning;
3. Healthy aboriginal communities;
4. Trends in rates of aboriginal participation in traditional activities and use of traditional territories;
5. Person days of employment in forestry-related activities and number of aboriginal owned and managed forest related businesses;
6. Aboriginal access to forest resources.

According to the Association:

NAFA has been involved in this process in an attempt to ensure that the rights and interests of Aboriginal peoples are reflected in the Canadian criteria and indicators. The position that we have brought to the table is that forest management is not sustainable if it does not respect and provide for Aboriginal and treaty rights...From

our perspective, Respect and Provision for Aboriginal and Treaty Rights is an essential element of sustainable forest management and is not optional. NAFA still believes therefore that Canada should take a leading role internationally by treating Aboriginal rights as a separate criterion.

The CSA has failed to incorporate this criterion and has failed to make any criteria mandatory.

### DECISION-MAKING

The SFM scheme requires opportunity for public participation but states:

It must be clear to all participants from the beginning that the final decision rests with the forest manager or owner. (p.24)

Many environmentalists are familiar with such processes of public consultation in forest planning and are deeply frustrated with them, due to the lack of acceptance of their concerns by the forest industry. The CSA process makes public participation a principle, but does not require responsiveness to public concerns. It purports to place considerable responsibility on the public, but does not require that resources for participation be provided by companies. The lack of mandatory criteria and indicators means that the future direction to be taken by planning teams and the public remains unclear. Public participation will be difficult to facilitate and will frustrate those involved. The end product could be light years removed from true biological sustainability. It appears that public participation will be a facade for the continuation of current practices.

### THE PROCESS OF DEVELOPING THE CSA SFM STANDARDS

The CSA claims that this system was developed:

in an open, inclusive, and consensus-oriented forum...(and) reflects the concerns of many individuals and groups with an interest in sustainable forestry, including...non-governmental environmental and Aboriginal organizations. (p.1)

In fact, the few environmentalists involved represent groups close to the government of Canada; groups most experienced and independent regarding forest ecology and protection work have not been involved. There are hundreds of First Nations in Canada; one First Nation (aboriginal) group was involved in the process.

Further, numerous environmental groups have repeatedly criticized the CSA for its frequent misrepresentation of the environmentalist role in the process. As proposed, the system does

not reflect the opinions of many greens and First Nations peoples. To the contrary, fifty-six groups joined in a letter on April 25, 1995, calling on the forest industry and CSA "to abandon this flawed process."

The CSA SFM approach remains a strategy funded and developed primarily by the Canadian forest industry.

### AUDIT LIMITATIONS

We have concerns about the proposed SFM certification audits, whose limitations lead to a lack of assurance that any particular certified product has actually been produced in an environmentally sustainable fashion.

First, the audits will not certify a "chain of custody" for any particular product. Such an audit would ensure that if a company claimed that a final consumer product came from a sustainably managed forest, the auditors would certify that its components could be traced back through the manufacturing processes to the actual source of sustainably produced wood. Under the CSA SFM system, nothing will prevent a company from having a particular forest certified, and then using its SFM certification to aid sales of products from other uncertified forests.

This deficiency rips a gaping hole in the reliability of any eco-label to be used under this system.

Further, the auditors will not be certifying "that key environmental, social, cultural or economic values were protected." Since such audits would require testing and evaluation over years, the CSA has opted for certification of systems, allowing companies to "provide an indication of performance almost immediately to their consumers and the general public." (Z809, p.4)

Nor will the CSA require that the audits be made public. Given the unwillingness of companies across Canada to make environmental audits public, we expect that these will remain confidential to the companies. The public will therefore not be able to test the reliability of the audits.

These audit limitations underscore the lack of credibility of the SFM certifications for sustainable management of forests and environmentally-preferred forest products.

### CONCLUSION

The numerous drafts of the CSA documents show a pattern of increasing length and complexity. We fear that the linguistic complexity is serving to obscure the subject, to fudge positions and to make key points more difficult to understand. This trend contradicts the aim

of building public and industry support for sustainable forest management.

The CSA position has been developed in isolation from a broader societal debate regarding acceptable logging practices, land use designations and management systems. It is small wonder that these issues are avoided or fudged in the CSA documents.

We fundamentally disagree that an industry can unilaterally define sustainable forest management as proposed by the CSA process. It represents an industry vision of sustainability. For this reason alone, it cannot be considered more than the manifesto of an interest group. The interest group has a demonstrated record of destructive operations and public opposition to measures aimed at improving the situation.

Across Canada, environmentalists and the Canadian public remain deeply concerned about industry practices in our forests: unsustainable levels of logging; lack of protection for biodiversity and other non-timber values; unresolved First Nations rights; resistance to creation of protected areas; and destructive harvest practices.

The direction forward to address these issues in a constructive and thoughtful manner would include land claim settlements, protected areas establishment, and the development of on-the-ground changes to forest planning and harvest. Such changes would allow the development of a performance-based certification process for sustainable forest management.

The CSA SFM certification will not guarantee that timber products will be coming from sustainably managed forests.

If the system is approved by the ISO and implemented, it will provide approval in international trade institutions for status-quo forest practices and land-use. Such approval will be used in the market place by the forest industry to convince consumers that existing land-use and forest practices are ecologically and socially sustainable. Such statements are incorrect and will threaten efforts to complete an ecologically representative protected areas system and to improve forest planning and harvest practices.

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This Discussion paper represents the position of members of the Algonquins of Barrier Lake (First Nation) and the following groups:

Canadian Environmental Law Association  
Canadian Environmental Network  
Concerned Citizens of Manitoba  
Conseil Regionale de l'environnement de Lanaudiere  
Defenders of Nopoming  
Earthroots



Environmental Coalition of Prince Edward Island  
Forest Caucus of BCEN  
Friends of the Earth  
Humber Environment Action Group  
Mouvement Vert Mauricie  
Northwatch Saskatchewan Forest Conservation Network  
Nova Scotia Coalition for Alternatives to Pesticides  
Pembina Institute for Appropriate Development  
Regroupement écologiste de Val d'Or et environ  
Save Our Forest Group (Jamestown, NF)  
Sierra Club of Canada  
Sierra Club of British Columbia  
Sierra Club - Aggasiz Group  
Sierra Club - Prairie Chapter  
South Peace Environment Association  
Union québécoise pour la conservation de la nature  
Voice of the Earth Society  
Wildlands League