



Peeling Back the Eco-Labels:

A Comparison of FSC and SFI Forest Certification Program Audits in Canada

Executive Summary

SFI's auditing program is, on balance, substantially less rigorous and transparent than FSC's. Of the two, FSC remains the benchmark for environmentally and socially responsible forest management.

The Forest Stewardship Council (FSC) and the Sustainable Forestry Initiative (SFI) are the two most prominent forest certification systems in Canada. Both have reassuring, forest-friendly names and logos, and consumers are likely to assume that they represent comparable standards in forest management. But how do these systems actually compare with respect to forestry standards and auditing processes? This report compares the forest management audits that are at the core of the forest certification process and forest certification systems' value and credibility.

Certification audits can be understood most simply as the process whereby certification bodies determine whether forest managers are in compliance with a certification system's forest management and conservation standards. Audits typically have two components: "desk audits" of the forest manager's plans and policies, and "field audits" of logging and other forestry operations in the woods. As such, they are integral to the certification process, and are the foundations of a certification system's credibility.

Using all publicly available audit reports going back to 2005, 50 FSC reports and 29 SFI reports, we compared the rigor of FSC and SFI audits in Canada along several key parameters, including:

- the qualifications and composition of the audit teams,
- the thoroughness of the audit process,
- the transparency of reporting.

The data reveals profound differences in the rigor of FSC and SFI audits.

FINDINGS:

- SFI audits required many fewer changes and improvements in forest management than did the FSC audits. The FSC auditors averaged four times as many major non-conformances per audit and six times as many minor non-conformances as the SFI auditors.
- SFI audits resulted in fewer improvements in logging practices. Twenty-three out of the 29 SFI audit reports included no corrective action requests for major non-conformances. Twice, SFI audit teams issued no non-conformances and no corrective action requests at all.
- About 55 percent of the public SFI audit reports excluded pertinent data; nine reports excluded total hectares, nine excluded auditor days, and three reports excluded

information on both. One more SFI report excluded the number of auditors. FSC reports never excluded such data.

- FSC auditors spend significantly more time ensuring that a company's practices conform to FSC standard than SFI auditors.
 - The average FSC audit spent almost three times more auditor days than their SFI counterparts.
 - On average, FSC auditors spent more than four times as many auditor days per 100,000 hectares as SFI auditors.
 - The average FSC audit team was 76 percent larger than SFI teams. The average FSC audit team had 3.7 people, while the average SFI team had 2.1 people
- FSC audit teams featured more diverse skill and knowledge sets. SFI audit teams consisted mostly of foresters trained to maximize production. FSC audit teams were more balanced between foresters, biologists and First Nations or community specialists.
- Ninety-two percent of the surveyed FSC audit reports were peer reviewed by at least one or two other professionals. None of the SFI reports were peer reviewed.
- On average, the FSC reports were almost eight times as long as the SFI reports. FSC audit reports provide more detail about the FSC's rules, scope of the audit, and reasoning behind corrective action requests. FSC also dedicates more detail to the auditors' qualifications and a thorough accounting of the audit team's methodology.

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Introduction

Consumer demand for environmentally responsible products is strong and continues to rise. According to an analysis by Environmental Business International, the global environmental market grew to \$1.047 trillion in 2013.¹ A study by the United Nations Environment Program found that the market for certified forest products alone is worth over \$20 billion per annum.²

As demand increases, so does the incentive for businesses to meet that demand. The market now includes many products that claim to be “natural” and environmentally friendly. Consumers are increasingly skeptical of these labels: they know that many corporations cynically target the green market with meaningless claims. Companies that *do* invest in environmentally sound practices are frustrated by less responsible producers whose empty claims weaken the market category and constitute unfair competition. In response to this deliberate confusion, citizens groups have partnered with industry leaders to create independent third party certification systems based on rigorous, transparent processes. These programs certify practices and products and use eco-labels to enable consumers, manufacturers, and suppliers to make green purchasing decisions with the confidence that labelled products reflect environmentally responsible practices.

The importance of responsible forestry, and certifications based on responsible practices, is doubly important in Canada. Almost 40 percent of Canada’s land area is forest, making up 10 percent of all the world’s forest cover. Canada’s forests, like the Amazon or Serengeti, are one of the world’s most important ecosystems. Canada’s ancient boreal forest contains an estimated 208 billion tonnes of carbon, 25 percent of the planet’s wetlands and iconic species such as caribou, wolverine and lynx. It is also home to numerous First Nations communities. However, Global Forest Watch recently found that Canada leads the world in deforestation; between 2000 and 2013 Canada was responsible for 21 percent of global forest degradation.³

Consumers around the world are increasingly trying to minimize harm to the planet by seeking environmentally friendly products and services. Corporate and individual consumers of wood and paper products, public interest organizations, and other stakeholders in the forest products marketplace frequently look to forest management certification systems to identify products from responsibly managed forests, and to avoid products from destructive forest operations.

In North America, the two most prominent forest certification systems are the Forest Stewardship Council (FSC) and the Sustainable Forestry Initiative (SFI). It’s not easy for consumers to compare the two systems, and many may just assume that they are equally rigorous. The Environmental Paper Network, a global network of conservation groups, assert

¹ <http://ebionline.org/ebj-archives/2776-ebj-v27n06-07> as cited in this article:

<http://www.environmentalleader.com/2014/12/02/environmental-industries-grew-in-2013/>

² “Executive Summary,” “Green Economy and Trade Trends, Challenges and Opportunities,” Trade, Policy and Planning Unit of the United Nations Environment Programme’s “Green Economy and Trade Opportunities Project.”

<http://www.unep.org/greeneconomy/GreenEconomyandTrade/GreenEconomyandTradeReport/tabid/106194/language/en-US/Default.aspx>

³ <http://o.canada.com/news/canada-leads-world-in-forest-decline-report-says>

only the FSC has acceptable standards for environmentally and socially responsible forest management, and all other forest certification systems lack some or all attributes of sustainable forestry. SFI and its supporters assert that its standard is functionally equivalent to FSC.

Our team evaluated the relative merits of the auditing programs of two certification systems. The FSC and SFI standards have been compared elsewhere.⁴⁵ This report goes to heart of the certification process and examines data to compare the rigor of FSC's and SFI's forest certification audits as they are conducted in practice.

This report analyzes all publicly available audit reports from the FSC and SFI over a period of ten years, 50 reports from FSC and 29 reports from SFI, to assess the comparative rigor of FSC and SFI audits in three areas: the qualifications and composition of the audit teams, the thoroughness of the audit process, and the transparency of publicly available reporting. The frequency with which the audits required changes (corrective action requests, or CARs) in forest management and conservation practices as a condition of certification was also examined, as an indicator of the overall environmental and social rigor of the certification systems' forest management standards.

⁴ "Pulp Fiction? Some eco-labels for wood less green than they appear," *Portland Tribune*, August 5, 2013
<http://portlandtribune.com/sl/158971-pulp-fiction->

⁵ Constance McDermott, Emily Noah and Benjamin Cashore, "Differences that Matter? A Framework for Comparing Environmental Certification Standards and Government Policies" *Journal of Environmental Policy and Planning*. Vol. 10, No. 1 (March, 2008), pp: 47-70.

Methodology

The Data Set

We reviewed all available FSC and SFI Canadian forest management certification audit reports published between 2005 and 2014, and available on the certification organizations' respective websites. Only the reports for initial audits were used. Reports for periodic "surveillance" audits and re-certifications were excluded given that they are by nature less extensive and rigorous than full audits. Reports solely for chain of custody or wood procurement audits were excluded to provide a more comparable data set, and to focus the analysis on the question of the comparative rigor of the two systems' approach to certifying forest management *per se*. Reports for audits of forests managed by government institutions or non-profits were also excluded, to further increase the comparability of the reports analyzed. The resulting initial data set consisted of 50 FSC audit reports and 29 SFI audit reports in Canada.

The data set was further reduced for the purpose of some calculations, due to the absence of data in some SFI audit reports. For example, several of the SFI reports failed to include data for the hectares audited or the number of days spent in the field. Some of the SFI data could be found elsewhere, but about 41 percent of the SFI audit reports had to be excluded from certain calculations because they were missing pertinent data. Of all the auditing firms and third-party auditors contacted for this information, only the Quebec Bureau of Normalization responded with the requested data. For the other audits, estimates of the hectares for most of these reports were found online through certificationcanada.org. Ultimately, 11 of the 29 SFI audit reports had to be excluded from calculations concerning days spent in the field because of this missing data. None of the FSC audit reports were missing the relevant data.

All reports, 50 FSC and 29 SFI, were still included in calculations concerning non-conformances issued and audit team size and diversity. Two of the SFI reports only listed a lead auditor, though the content of these reports referred to multiple members. The auditing firms were generally unresponsive to requests for additional or missing information. . Those that did respond to email requests for additional data refused to provide the information, citing the fact that SFI does not require them to make this information public.

The Analysis:

The rigor of FSC and SFI audits were assessed using the following indicators:

- *The average number of auditor days spent in the field for FSC and SFI audit reports.* This was calculated in terms of the total auditor days spent in the field and as a unit of auditor days spent per 100,000 hectares in the forest holding. Forest tracts that were less than 100,000 hectares were excluded from the second calculation, as they warped the data. For example, a single audit of a forest tract of 1,000 hectares that still required one or two auditor days would completely overthrow several tracts of 100,000 or more that also saw only one or two auditor days in calculating the averages.

- *The average size and professional diversity of the audit teams.* For this metric, auditors were sorted into the categories of forester, wildlife biologist, First Nations/community specialist or other (consisting of observers and auditors not clearly listed with any of the prior recorded qualifications).
- *The practice of peer reviews of audit reports.* Peer review is the primary mechanism in the scientific community for establishing the credibility of research prior to publication. Peer review is also an important step for assessing the validity of forest certification audits. Given the relative lack of peer reviewing among the audits, the analysis only tracked whether or not a peer review was conducted at all.

The transparency of FSC and SFI audits were assessed using the following indicators:

- *The inclusion and exclusion of data.* This category tracks the presence or absence of basic information on the size and composition of audit teams, as well as gaps in other pertinent data sets such as total hectares and auditor days as components of the audit reports.
- *Responsiveness to public concerns.* The biggest variation between FSC and SFI is on reporting on what issues were raised by public and how certifiers addressed those issues.
- *The average number of pages per report.* The length of the report is a simple but objective method of measuring the depth and thoroughness of a report.

The rigor of the FSC and SFI forest management standards of environmental and social impact were assessed using the following indicators:

- *The extent to which forest managers were required to change/improve their actual forest management and conservation practices to achieve certification.* This was measured in terms of the average number of non-conformances, major or minor, issued to the certified companies. This assumes that there is no fundamental difference in the baseline quality of forest management between the companies certified by FSC and the companies certified by SFI prior to their certification. The distinction between major and minor non-conformances is that the former prevents a forest manager from receiving certification until it has been corrected. A tract of forestland may still be certified despite the presence of multiple minor non-conformances, so long as they are eliminated by the next yearly surveillance audit.

In this report, “average” refers to the average of the aggregated data in FSC reports and of the aggregated data in SFI reports for each indicator.

Findings

Primary Results: We found major differences between the rigor of FSC and SFI audits.

- FSC audits required many more changes and improvements in forest management than did the SFI audits, suggesting that the FSC's forest management standards are more environmentally and socially rigorous than those of the SFI. The FSC auditors averaged four times as many major non-conformances per audit (0.8 versus 0.2) and six times as many minor non-conformances (18.9 versus 3.1) as the SFI auditors. Twenty-three out of the 29 SFI audit reports included no corrective action requests for major non-conformances. Twice, SFI audit teams issued no non-conformances and no corrective action requests at all.
- FSC auditors spent an average of about 29 auditor days per audit, almost three times more than their SFI counterparts.
- FSC auditors spent more than four times as long for every 100,000 hectares as SFI auditors. FSC audits averaged 5.9 auditor days per 100,000 hectares to the SFI's 1.4 auditor days per 100,000 hectares.
- The FSC audits included more auditor days than did SFI audits, despite the smaller average size of FSC certified lands. The SFI certified forests average one million hectares, and the FSC certified forests average about 824,000 hectares. The difference could be related to the number of auditors on each audit. The average SFI audit team was 2.1 people in comparison to the average FSC team of 3.7. So, the average SFI auditor would have to cover about 476,000 hectares, whereas the average FSC auditor would have to cover about 223,000 hectares.
- 92 percent (46 out of 50) of the surveyed FSC audit reports were peer reviewed by at least one or two other professionals. None of the SFI reports were peer reviewed.
- FSC audit teams were significantly more diverse in expertise. Given that the average number of auditors in an FSC team is 3.7 auditors, most FSC audits would usually include at least one biologist (0.9 per audit) or First Nations or social aspects specialist (0.8) and one or more foresters (1.2). In an average team of 2.1 auditors, SFI audits would often be comprised of only one or two foresters (1.6).
- SFI audits rarely included biologists (0.1) and practically never featured a clear First Nations or social aspects specialist (0.0). Both FSC(0.7) and SFI(0.5) audits included auditors that fit with in the Other category described earlier.

- FSC audit reports were far more complete and transparent than the SFI reports. About 55 percent (16 out of 29) of the public SFI audit reports excluded pertinent data, including total hectares or auditor days. For example, a report that excluded the total number of hectares could not be included in the calculation to determine auditor days per 100,000 hectares. The FSC reports never excluded data such as total hectares or the length of the audit.
- FSC reports went into greater depth than their SFI counterparts, especially on the details of non-conformances and other areas of improvement or excellence. On average, the FSC reports were almost eight times as long as the SFI reports, 46.7 pages versus 6.2 pages respectively. FSC audit reports provide more detail about the FSC's rules, scope of the audit, and reasoning behind corrective action requests. FSC also dedicates more detail to the auditors' qualifications and a thorough accounting of the audit team's methodology.

Conclusion

The published reports for FSC and SFI Canadian forest certification audits provide basic information that can help consumers and other stakeholders compare the rigor and credibility of these two prominent certification systems. Such information can help companies that purchase wood and paper products make informed decisions about what role to assign the FSC and SFI within their corporate sustainability and wood and paper procurement systems.

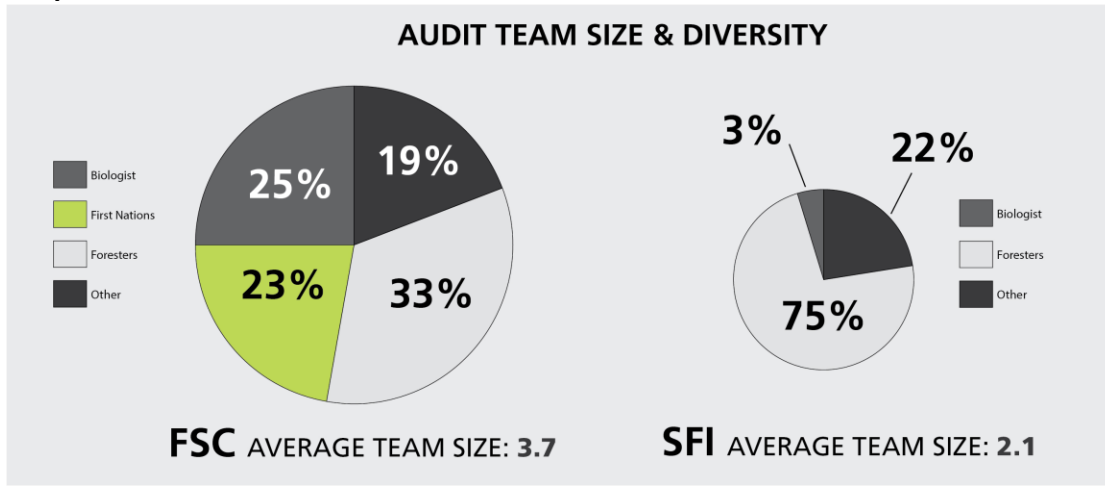
Based on their audit reports, FSC audit teams contain greater expertise in ecological and social aspects of forest management, and to spend more time evaluating the forests being certified. The rigor and quality of FSC audits is buttressed by peer review, whereas SFI audits had no such system for peer review. The FSC audit reports also tend to be more transparent and provide more information of interest to stakeholders. Audits under the FSC standard are also more consistent among the third-party auditing firms than audits conducted under the SFI standard.

Certification audit reports also provide a valuable perspective on certification standards for forest management and conservation. As indicated by the substantially greater number of corrective action requests contained in the audit reports, FSC certification holds forest management to significantly higher standards than does SFI certification.

The FSC standards are, on balance, substantially more rigorous and transparent. Of the two, FSC remains the benchmark for environmentally and socially responsible forest management.

Appendix

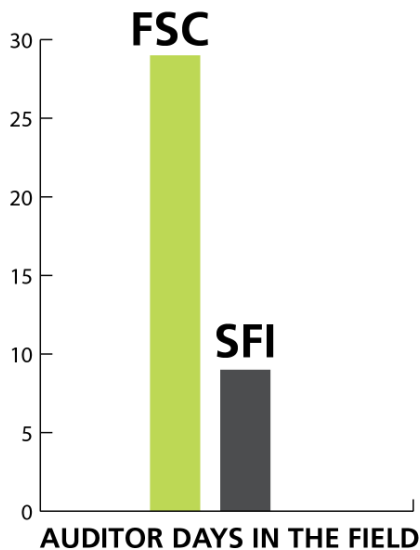
Graph 1:



Team size refers to the size of the audit teams. SFI audit teams are smaller than FSC audit teams. Average team diversity refers to the different professions and expertise of auditors employed to evaluate the particular standard. The data seems to show that SFI emphasizes foresters over any other area of expertise, while FSC seems to favor a more diverse team of auditors.

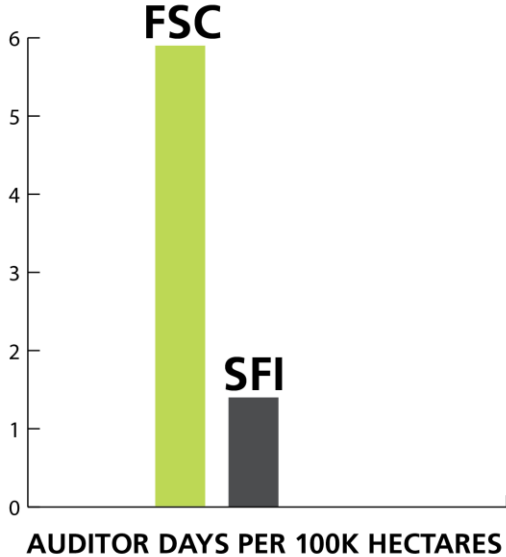
- the relative number of Registered Professional Foresters (RFP) on audit teams.
- the relative number of biologists on audit teams.
- the relative number of First Nations and community specialists on audit teams.
- the relative number of unidentified or other professionals on audit teams.

Graph 2:



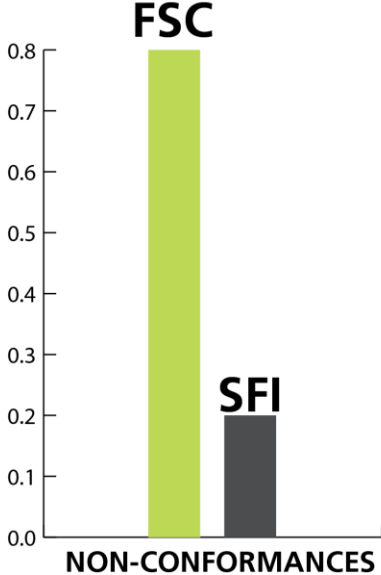
The average number of work days auditors spent on audits.

Graph 3:



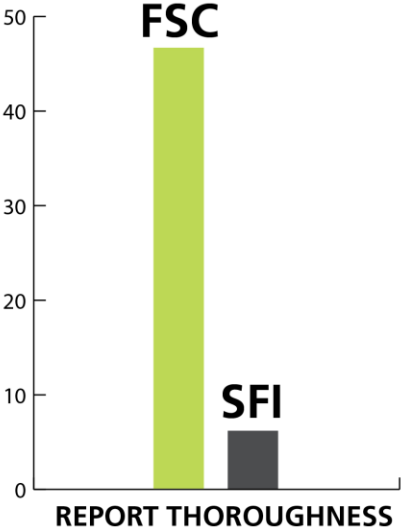
The average number of work days auditors spent on audits per 100,000 certified hectares

Graph 4:



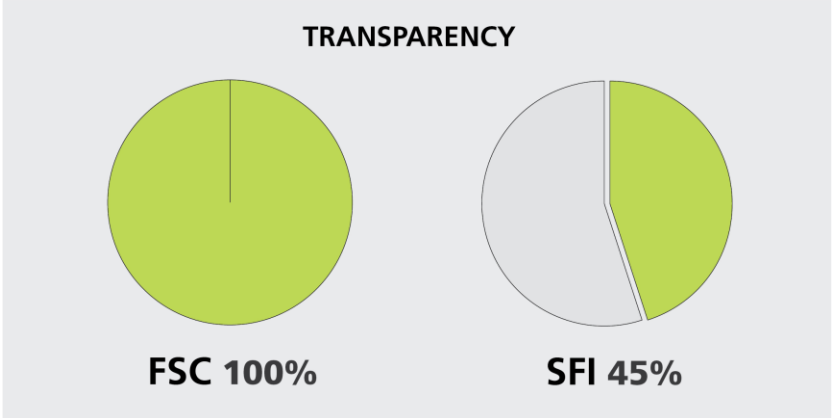
Auditors identify areas where companies fail to conform to the standards by issuing corrective action requests (CAR) for each non-conformance. Minor non-conformances do not prevent certification, but need to be corrected before the next audit. Major non-conformances prevent certification and must be fixed before the company can be certified. The more non-conformances issued, the more rigorous the standard and auditing program.

Graph 5:



The average length of audit reports, indicative of thoroughness and detail.

Graph 6:



The frequency with which audit reports excluded important data.

Table 1: Complete Data Set

Performance on key indicators		SFI	FSC
Audit Rigor			
<i>Average number of auditor days</i>		10.0	29.0
<i>Average number of auditor days per 100,000 hectares</i>		1.4	5.9
<i>Average size of audit teams (persons)</i>		2.1	3.7
<i>Average Team Diversity (persons)</i>	Registered Professional Forester (RPF)	1.6	1.2
	Biologist	0.1	0.9
	First Nations/community specialist	0.0	0.8
	Other*	0.5	0.7
<i>Number of audit reports peer reviewed</i>		0 out of 29	46 out of 50
Audit Transparency			
<i>Number of audit reports missing data</i>		16 out of 29	0 out of 50
<i>Average number of pages in public summary</i>		6.2	46.7
Substantive changes required			
<i>Average number of non-conformances/certificate granted</i>		0.2 major 3.1 minor	0.8 major 18.9 minor

* Other refers to auditors who either did not fall under the primary categories (forester, biologist, social expert), such as observers, or whose expertise was not clearly identified.

Table 2: Highest number of non-conformances issued by each standard in a single certificate

	<u>SFI</u>	<u>FSC</u>
Major	2	9
Minor	7	47

Table 3: Average Hectares certified

<u>SFI</u>	<u>FSC</u>
1,048,680.00	824,038.00

Table 4: List of audit reports**FSC audits:**

Company	Certification Firm	Audit Date
Taan Forest Limited Partnership	Rainforest Alliance	August 22-26, 2011
AbitibiBowater inc.	Rainforest Alliance	May 11- 15, 2009
AbitibiBowater	Rainforest Alliance	March 22-25, 2010
AbiBow Canada Inc.	Rainforest Alliance	February, 20-25 2012
Arbec s.e.n.c.	QMI-SAI Global	November 9 – 11 2009, January 25-28 2010
Association des propriétaires de boisés de la Beauce	Rainforest Alliance	August 30 to September 30, 2010
Barrette Chapais Ltée	Rainforest Alliance	October 8-12, 2013
Boisaco Inc.	SGS	December 1-2, 2010, March 31, April 1, 2011
Chabot, Pomerleau and associés	Rainforest Alliance	May 16-17, 2011
Chantiers Chibougamau Ltée	Rainforest Alliance	August 17-20, 2009
Gestion Forap Inc.	Rainforest Alliance	April 26-29, 2010
Gestion Forestière du Saint-Maurice Inc.	QMI-SAI Global	August 26-30, 2013
Gestion Forestière Lacroix Inc.	QMI-SAI Global	February 21 to 24, 2012
Gestion Rémabec inc. / Produits Forestiers Arbec S.E.N.C.	QMI-SAI Global	November 9-11, 16-20, 2009
Gestion Solifor Inc.	QMI-SAI Global	February 28, 29, March 1-2 2012
Groupe Crête division Riopel Inc.	Rainforest Alliance	February 3-6, 2014
Groupe Crête division St-Faustin Inc.	Rainforest Alliance	November 20-23, 2012
Groupement forestier Chaudière inc.	QMI-SAI Global	August 30 to September 2, 2010, August 15-19, 2011
Domtar	QMI-SAI Global	November 3-7, 2008
Domtar	SGS	July 2004 and June 6-10, 2005
Syndicat des producteurs de bois de l'Estrie	Rainforest Alliance	July 6-16, 2009
Kruger Inc.	Rainforest Alliance	June 11-19, 2009
Lauzon – Planchers de bois exclusifs inc.	Rainforest Alliance	September 22-25, 2008
Resolute FP Canada, Inc.	QMI-SAI Global	March 21-23, 2012, May 28 to June 1, 2012
Resolute FP Canada, Inc.	QMI-SAI Global	May 14-17, 2012
Scierie Carrière Ltée.	Rainforest Alliance	21-24 September, 2009
Scierie Dion et Fils Inc.	Rainforest Alliance	December 11-14, 2012
Scierie Dion et Fils Inc.	Rainforest Alliance	October 22-24, 2008
Scierie Jean Riopel inc.	Rainforest Alliance	November 3-6, 2008
Scierie Opitciwan	QMI-SAI Global	September 18-20, 2012, December 3-7, 2012
Séminaire de Québec	QMI-SAI Global	March 26 to 29, 2012, September 17 to 21,
Société en commandite Scierie Opitciwan	QMI-SAI Global	December 3-7, 2012
Taché inc.	Rainforest Alliance	August 3-7, 2009
TAG	QMI-SAI Global	November 12-16, 2013
Tembec	Rainforest Alliance	April 14-18, 2008
Terra-Bois, Coopérative de propriétaires de boisés	Rainforest Alliance	June 26-29, 2012
Federation of Nova Scotia Woodland Owners	Rainforest Alliance	October 18-20, 2011
Abitibi River Forest Management Inc.	Bureau Veritas	June 3-7,27-28, July3-4, 8, 2013
Tembec	QMI-SAI Global	January 26-29, 2010
AbiBow Canada Inc.	Rainforest Alliance	June 6 - 11, 2011
Bancroft Minden Forest Company	Soil Association Woodmark	February 16-19, 2012, September 17-20, 2012
Bowater Canadian Forest Products Inc.	Rainforest Association	June 1-5, 2009

Domtar	QMI-SAI Global	December, 2007, February 25-28, 2008
Hearst Forest Management	Rainforest Alliance	November 1 - 5, 2010
Mazinaw-Lanark Forest Inc.	Soil Association Woodmark	February 20-23, 2012, September 21-24, 2012
Nawiinginokiima Forest Management Corporation	Rainforest Alliance	November 25-29, 2013
Ottawa Valley Forest, Inc.	Soil Association Woodmark	Dec 17-19, 2009, June 7-11, 2010
Timiskaming Forest Alliance Inc	Rainforest Alliance	January 11 to Feb 2, October 24-28, 2011
White River Forest Products, Ltd.	Bureau Veritas	February 3-7, 2014
Corner Brook Pulp and Paper	QMI-SAI Global	November 2010, Sept 19- 23, 2011

FSC audits:

Company	Certification Firm	Audit Date
Ainsworth Lumber Co.Ltd.	KPMG	September and October 2010
Carrier Lumber Ltd.	KPMG	July 1, 2011
C&C Wood Products Ltd.	QMI-SAI Global	March 3-10, 2011
Coulson Forest Products	QMI-SAI Global	May 19-25, 2011
Federated Co-operatives Ltd.	KPMG	October 1, 2009
Gorman Group of Companies	QMI-SAI Global	September 23-26, 2013
Mackenzie Fibre Management Corporation	QMI-SAI Global	July 6-8, 2011
Wynndel Box & Lumber Co. Ltd	KPMG	April 25-27, 2012
Wynndel Box & Lumber Co. Ltd	KPMG	July 22-24, 2013
Stuwix Resources Ltd.	QMI-SAI Global	March 28-31, 2011
Norbord, Inc.	SGS	June 3-6, 2010
Resolute FP Canada, Inc.	BNQ	October 16-18, 2012
Resolute Forest Products Canada, Inc.	BNQ	November 11-14, 25-29, February 25-27, 2013
ANC Timber Ltd.	KPMG	October 2010 and May 2011
Alberta Pacific Forest Industries	KPMG	Between November and December 2012
Buchanan Lumber	KPMG	February and March 2012
C&C Resources Ltd.	QMI-SAI Global	February 25 to March 8, 2013
Manning Diversified Forest Products, Ltd.	QMI-SAI Global	February 7-9, 2012
Millar Western Forest Products Ltd.	KPMG	November 1, 2009
Tolko Industries Ltd. — Athabasca OSB division's	KPMG	December 2-5, 2013
Port Hawkesbury Paper LP	QMI-SAI Global	May 27-30, 2014
Abitibi River Forest Management Inc	Bureau Veritas	June 3-7, 2013
Domtar Inc.	QMI-SAI Global	February 11-15, 2013
Dryden Forest Management Co. Ltd.	QMI-SAI Global	September 21-24, 2009
Green Mantle Forest, Inc.	QMI-SAI Global	May 10-13, 2011
Lake Nipigon Forest Management Inc.	QMI-SAI Global	September 10-12, 2013
Nipissing Forest Resource Management Inc.	QMI-SAI Global	April 30-May 2, 2014
Carrier Forest Products Ltd	KPMG	August 1, 2013
Meadow Lake OSB	KPMG	August 1, 2013