



February 27, 2017

Sent via electronic mail

Mr. Derek Nighbor
Chief Executive Officer
Forest Products Association of Canada
Suite 410-99 Bank Street
Ottawa, Ontario
K1P 6B9

Dear Mr. Nighbor:

Thank you for your letter dated February 9th, 2017, responding to our recent video featuring the Cree First Nation of Waswanipi and their concerns about forestry threats to the Broadback forest. We were honored to feature voices of this Cree community, which has called the Broadback home for millennia. The Broadback is one of the few intact forests left in the southern half of the boreal forest, yet the Waswanipi have lost the vast majority of their traditional territory to forestry activities according to an analysis we commissioned by Global Forest Watch Canada.¹

The Natural Resources Defense Council (NRDC) is a U.S.-based international environmental organization with a long history of advocacy work with partners in Canada. For more than thirty years, NRDC has worked in partnership with Canadian Indigenous Peoples and environmental organizations to support sound environmental decision-making and preserve some of the world's most precious and iconic ecosystems. As with all of our Canadian engagement, our attention to these issues stems from the impacts of U.S. consumption on Canadian natural resources, as well as the global ecological importance of these natural resources. As the destination of over 80% of the forest product exports from Ontario and Quebec, the U.S. marketplace has a responsibility to ensure that its demand does not come at the expense of Canada's boreal forest and First Nations communities.²

Contrary to your claim about Canada's reputation for forest management, the Harvard University and Massachusetts Institute of Technology Social Progress Index, an indicator that measures a country's protection of terrestrial areas and endangered species, ranks the country as 102nd for biodiversity and habitat. Across Canada, there is a disturbing

¹ NRDC, "Time Series Analysis of Anthropogenic Disturbance in the Broadback River Watershed, Quebec," October 2016, <https://www.nrdc.org/sites/default/files/broadback-watershed-bulletin-20161019.pdf>.

² In 2014, the United States accounted for 80% of Quebec's forest product exports – or \$6.9 billion – and 95% of Ontario's – or \$3.7 billion. Natural Resources Canada, "The State of Canada's Forests 2015," www.cfs.nrcan.gc.ca/pubwarehouse/pdfs/36553.pdf; Natural Resources Canada, "The State of Canada's Forests Annual Report 2016," cfs.nrcan.gc.ca/pubwarehouse/pdfs/37265.pdf.

decline in intact forest landscapes, largely due to clearcut logging practices.³ Since 2000, an area of the boreal more than 23 times the size of the footprint of the entire tar sands industry has been logged.⁴ At current rates, over one million acres of land is clearcut in Canada every year.⁵ Between 2000 and 2013, intact forest landscapes in the country declined by nearly 40 million acres—equivalent to the size of Florida.⁶ While some of this degradation was due to natural causes, 32 million acres of intact forest loss was within tracts allocated to logging companies.⁷ Further, there is increasing concern that heavily logged forests are not regenerating with the same levels of species diversity, and that regeneration rates are well below the legally mandated 100 percent that you reference. There is also concern that forests do not recover at a rate that offsets the impacts of logging taking place year after year.⁸ Therefore, the assertion that “forests are not disappearing” does not hold with the facts on the ground.

Facts also do not support the claim that more than half of Canada’s forestlands are sustainably managed due to those forests being covered by sustainable forestry certificates. Not all certification systems are equal in their requirements, and on-the-ground compliance (or non-compliance) with requirements has created situations where forestry impacts vary wildly.⁹ This is especially true for certification schemes such as the Programme for Endorsement of Forest Certification (PEFC) and the systems it endorses

³ Wynet Smith and Ryan Cheng, “Canada’s Intact Forest Landscapes: Updated to 2013,” Global Forest Watch Canada, 2016, http://globalforestwatch.ca/sites/gfwc/files/publications/GFWC%20IFL%20bulletin%202016%20July%20Final_0.pdf.

⁴ The Alberta Biodiversity Monitoring Institute shows 2.2% of the tar sands region is disturbed by oil production activities or 3,080 square kilometers (768,000 acres) compared to over 18 million acres of boreal clearcut since 2000. ABMI, “The Status of Biodiversity in the Oil Sands Region of Alberta,” 2014, http://ftp.public.abmi.ca//home/publications/documents/40_ABMI_2014_StatusofOSRBiodiversityPreliminary_ABMI.pdf.

⁵ An average of 1.064 million acres of the Canadian boreal forest has been clearcut every year for the last 10 years. Our estimate is based on clearcut logging in done in provinces where most logging activity takes place in the boreal forest. These are Newfoundland, Quebec, Ontario, Manitoba, Saskatchewan, and Alberta. This likely underestimates that climate impact of clearcutting in the boreal to date, as it 1) uses clearcutting figures over the last ten years – which have been lower than the 25 year average and assumes complete quantitative and qualitative boreal regeneration, while observed rates are significantly lower. National Forestry Database, “6.1 Silvicultural Statistics by Province/Territory *a, 1990-2015,” http://nfdp.ccfm.org/data/compendium/html/comp_61e.html.

⁶ Wynet Smith and Ryan Cheng, “Canada’s Intact Forest Landscapes: Updated to 2013,” Global Forest Watch Canada, Bulletin, Ottawa Ontario, 2016, http://globalforestwatch.ca/sites/gfwc/files/publications/GFWC%20IFL%20bulletin%202016%20July%20Final_0.pdf).

⁷ Id.

⁸ See for example, Government of Ontario, “Annual Report on Forest Management 2012-2013: Forest Renewal and Maintenance,” <https://www.ontario.ca/page/annual-report-forest-management-2012-2013#section-7>.

⁹ Jim Ford and Anna Jenkins eds., “On the Ground 2011: The Controversies of PEFC and SFI,” Climate for Ideas et al., September 2011, http://www.wwf.de/fileadmin/user_upload/PDF/On_The_Ground_2011.pdf.

such as the Sustainable Forestry Initiative (SFI) and the Canadian Standards Association Sustainable Forest Management System (CSA).¹⁰ These standards, which are industry-backed and in some cases industry-run, have faced significant criticism for providing inadequate protections in managed forests, their lack of transparency, and the many loopholes that allow operators to avoid key conservation measures.¹¹ In many cases, these certifications fail to consider or measure declines in key forest health indicators—such as woodland caribou and more recently, moose¹²—giving consumers a false belief in the sustainability of the products they are purchasing.

NRDC supports rigorous, strict, independent, and scientifically sound sustainability certification schemes. We played an early role in the creation of the Forest Stewardship Council, and support that system's independence and attempts to adjust policy in light of changing conditions in the forests it certifies. But certification of the boreal, even via the FSC system alone, is not enough to protect overall forest health. Governments and industry must do more to ensure that remaining intact and culturally important forest landscapes are preserved, and that logging practices are not harming the countless ecosystem services that Canada's boreal forest provides to the country and the globe. The loss of intact forest landscapes in the southern half of the boreal, largely found in logging tenures and forest management units including in and around the Broadback River watershed, is the on-the-ground evidence that more must be done.

Evidence also shows that the claim that continued high levels of clearcut logging in Canada's boreal forest is a tool for mitigating climate change is highly misleading. Clearcutting, which accounts for over 90 percent of the forestry activities in Canada, reverses the beneficial carbon sequestration process of the forest, primarily by disturbing fragile, carbon-rich boreal soils. Recent studies show the stark difference between the carbon footprint of an intact boreal forest landscape and a clearcut forest.¹³ Though you have referenced the Intergovernmental Panel on Climate Change (IPCC) to further support your assertions, you are misrepresenting the ultimate conclusions of their work in this area. Indeed, that same report identifies the type of permanent protection called for by the Waswanipi Cree as an effective means of combatting climate change by maintaining or

¹⁰ E. Hansen et al., "Forest Certification in North America," Oregon State University, January 2006, <https://environment.yale.edu/files/biblio/YaleFES-00000148.pdf>.

¹¹ Forest Ethics, "SFI New and Unimproved: Analysis of Revised Sustainable Forestry Initiative Standards," <https://www.nrdc.org/sites/default/files/sfi-report-new-and-unimproved.pdf>.

¹² Kristin Rushowy, "Ontario's Moose Population Under Threat, Some Bats May Be Wiped Out Entirely, Environment Report Says," thestar.com, October 26 2016, <https://www.thestar.com/news/queenspark/2016/10/26/ontarios-moose-population-under-threats-bats-may-be-wiped-out-entirely-environment-report-says.html>.

¹³ R. F. Grant et al., "Net Ecosystem Productivity of Temperate and Boreal Forests after Clearcutting—A Fluxnet-Canada Measurement and Modelling Synthesis," *Tellus B*, 2010, 62(5): 475-496; O. Bergeron et al., "How Does Forest Harvest Influence Carbon Dioxide Fluxes of Black Spruce Ecosystems in Eastern North America?" *Agricultural and Forest Meteorology*, 2008, 148(4): 537-548.

increasing forest carbon stocks.¹⁴ We agree that the IPCC has recognized the important role that our world's forests play in sequestering greenhouse gases, but the IPCC also recognizes that forestry activity must, over time, lead to afforestation and not cause forest degradation.¹⁵

We can all agree that the boreal is one of the world's last ecologically important intact forests. But less than ten percent of Canada's boreal forest is permanently protected through parks and reserves.¹⁶ The International Boreal Conservation Science Panel has concluded that a minimum of half of the boreal forest must be protected from industrial disturbance to maintain its ecological integrity.¹⁷ And importantly, while that 50 percent figure is critical, setting aside this area is not the end of the story. Protected areas must also enjoy substantial enough connectivity amongst them to ensure that terrestrial and aquatic ecosystems are not cut off from one another.¹⁸ While there have been some good examples of collaboration around conservation in the boreal, we were recently very disappointed to see Quebec move the northern boundary of its commercial forest, opening over 15 million acres on net to logging.¹⁹ This does not seem to go in the direction of conserving Quebec's boreal forest.

Clearly, more protection is needed, and it is imperative that the forest industry collaborate with stakeholders to prevent further loss of intact forest landscapes starting in the commercial logging areas in the southern portion of the boreal. These intact forest landscapes are home to the threatened woodland caribou that now occupy half of their original range in the boreal. Of Canada's 57 woodland caribou herds, only 17 have a self-sustaining population. Without intervention, the other 40 herds are likely to disappear.²⁰

¹⁴ Gert Jan Nabuurs et al., "Chapter 9: Forestry," In *Climate Change 2007: Mitigation*, B. Metz et al. eds., Cambridge University Press, 2007, table 9.10, <https://www.ipcc.ch/pdf/assessment-report/ar4/wg3/ar4-wg3-chapter9.pdf>.

¹⁵ Ibid. figure 9.4.

¹⁶ As of 2014, only 8.1 percent of Canada's boreal forest was permanently protected through parks and reserves. Margaret E. Andrew, Michael A. Wulder, and Jeffrey A. Cardille, "Protected Areas in Boreal Canada: A Baseline and Considerations for the Continued Development of a Representative and Effective Reserve Network," *Environmental Reviews*, June 2014, 22(2): 1-26, p4

https://www.researchgate.net/publication/274265640_Protected_areas_in_boreal_Canada_A_baseline_and_considerations_for_the_continued_development_of_a_representative_and_effective_reserve_network. Only 10.7 percent of land managed by the forest industry is permanently protected. Greenpeace Canada, "Boreal Forest," <http://m.greenpeace.org/canada/en/high/Forests/Boreal/>.

¹⁷ Pascal Badiou et al., "Conserving the World's Last Great Forest Is Possible: Here's How," International Boreal Conservation Science Panel, July 2013, p. 10, <http://borealscience.org/wp-content/uploads/2013/07/conserving-last-great-forests1.pdf>.

¹⁸Id, p. 10-11, 14-15.

¹⁹ Ministère des Forêts Québec, "Limite Nordique des Forêts Attribuables," <http://mffp.gouv.qc.ca/publications/faune/limite-nordique-forets-attribuables.pdf>.

²⁰ Environment Canada, "Recovery Strategy for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population, in Canada," 2012, p. 2, https://www.registrelep-sararegistry.gc.ca/virtual_sara/files/plans/rs_caribou_boreal_caribou_0912_e1.pdf; CPAWS and David

We remain hopeful that Canada's provincial and federal governments will do everything in their power to set aside critical habitat for this species, starting with developing provincial recovery plans this year. This means the forest industry must stop logging in remaining intact forest landscapes within the commercial logging zone to preserve critical habitat for these herds.

We also reject the contention that science based conservation of the boreal forest comes at the economic expense of Canadian communities. While the challenges faced by the Canadian forestry industry are well documented, the many reports evaluating this issue – including several commissioned by the Forest Products Association of Canada – have identified economic and structural issues, rather than limitation in timber supply, to be their root cause.²¹ These reports have not identified aboriginal or local community access, caribou or other species protection, or land conservation as factors making significant contributions to the industry's decline. The one ecological exception is the declining availability of larger trees in Quebec—a reality driven by the location and scale of logging activity. In spite the increase in acreage that can be harvested, the reduction in size of logs and availability of material for high-end timber products appears to be a factor in the decline of profitability in the industry.²² A new approach is needed if Canada's boreal forest and its northern communities are to have a sustainable future.

We agree that collaboration will be critical to protecting the boreal forest. The Waswanipi Cree in the video say they want to come together with the forest industry to obtain protection of their remaining homeland, a goal they have been pursuing with the Cree Nation Government for well over a decade. To do that, they also need the Quebec government's support, and ideally the support of many of the companies you represent.

As the youth leader from that community says in the video:

Our culture is out there on the Broadback. Our identity is out there on the Broadback. That's why it's so special and so crucial to protect. What we're ultimately trying to achieve is a large intact old-growth forest that's protected, that has limited access, that is not impacted by forestry or logging practices.

Suzuki Foundation, "Population Critical: How are Caribou Faring?" December 2013, p. 3, http://www.davidsuzuki.org/publications/BorealCaribouReport-CPAWS_DSF.pdf.

²¹ Evan Capeluck and Jasmin Thomas, "A Detailed Analysis of Productivity Trends in the Forest Products Sector in Ontario, 2000-2013: Sunset Industry or Industry in Transition?" Centre for the Study of Living Standards, July 2015, p. 100, <http://www.csls.ca/reports/csls2015-06.pdf>; Natural Resources Canada, "Canadian Forestry Service, The State of Canada's Forests Annual Report 2010," 2010; http://publications.gc.ca/collections/collection_2010/nrcan/Fo1-6-2010-eng.pdf; Natural Resources Canada, "The State of Canada's Forests and 2015," www.cfs.nrcan.gc.ca/pubwarehouse/pdfs/36553.pdf.

²² Government of Québec, *Budget 2016-2017: Competitiveness in the Québec Forest Industry*, March 17, 2016, <http://www.budget.finances.gouv.qc.ca/budget/2016-2017/en/documents/Forest.pdf>. P.4.

We recognize that the boreal forest is a resource of global ecological importance and the threats facing it are being driven in large part by demands from the U.S. marketplace. We stand with the Cree and others to ask that the forestry industry and Quebec government join what the many scientists of the International Boreal Conservation Science Panel call a “last-of-our-time conservation opportunity” and complete protection of the Broadback watershed once and for all.

We thank you for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'SCL', with a long horizontal flourish extending to the right.

Susan Casey-Lefkowitz
Chief Program Officer, Natural Resources Defense Council

cc -

Honorable James Gordon Carr, Minister of Natural Resources
Honorable Kathryn McGarry, Minister of Natural Resources and Forestry, Ontario
Honorable Luc Blanchette, Minister of Forests, Wildlife and Parks, Quebec
Mr. André Tremblay, President & Chief Executive Officer, Québec Forest Industry Council
Ms. Jamie Lim, President & Chief Executive Officer, Ontario Forest Industries Association