



Synopsis and Outcomes Public Review of Enquiry Draft PEFC Canada – Sustainable Forest Management standard

Date: April 4 to June 6, 2023 60 day public review period

The following links illustrate how the public review and draft standard were displayed on PEFC Canada website (previous versions of website pages which have been saved and launched):

- 4/5/2023 [Public Review - Draft PEFC Canada – Sustainable Forest Management Standard](#)
- 4/5/2023 [Forest Management Certification](#)

A public announcement was distributed in a targeted outreach to the following individuals and organizations:

- PEFC Canada Board of Directors and National Governing Body
- PEFC Canada Technical Committee
- Former members CSA Sustainable Forest Management Technical Committee S2025
- CSA User Groups (companies certified to CSA Z809 Sustainable Forest Management standard and their Public Advisory Groups)
- PEFC International Board Member
- Indigenous individuals and organizations (Indigenous Bar Association, First People's Law, BC Assembly of First Nations),
- Natural Resources Canada and provincial government contacts
- Forest Stewardship Council Canada
- Sustainable Forest Initiative Canada
- BC Forest Innovation and Investment
- Canadian Post secondary offering forestry or natural resources education
- Canadian Forest Professional associations/ organizations
- Forest Products Association of Canada
- Council of Forest Industries
- Other non-governmental organizations identified that were interested / may have interest

The following is a summary of revisions completed and action taken as a result of the input. Full detail of the revisions is found on the draft titled '2023-06-22 PEFC Canada – SFM standard draft for TC final review v2 actions and edits as discussed at mtg with HVCA reviewed'.



Comment/ proposed change/ idea	Actions
<p>Section 1.4 Introductions – comments related to respectful language / ideas for inclusion of Indigenous perspectives.</p>	<p>Introduction section in particular was updated and throughout the standard, incorporated suggested wording, seek clarification on terms associated with colonization (i.e., crown duty).</p>
<p>French translation comments and several terms/ sentences that could be reconsidered for clarity (in English). In particular, the definitions section.</p>	<p>TC determined to use “gestion durable des forêts” (GDF) in the French translation as it is internationally accepted Definitions and edits accepted.</p>
<p><i>“I liked what I read in the PEFC document, especially the parts about biodiversity and working with First Nations. I do have one area of concern that I didn't see touched on in PEFC CAN ST 1001:20xx and that's the purchasing of 3rd party logs by a PEFC certified Forestry company. It was brought to my attention last Tuesday at the [organization] PAG meeting that they purchase about 50% of the logs from other Forestry companies and are allowed to mark the lumber as CSA certified even though the Forestry companies that logged those trees are not CSA certified. My concern is that Forestry companies that aren't held to the PEFC standard are still getting the PEFC stamp of approval even though they are not logging to the PEFC standards that are above and beyond the Provincial standards. This practice doesn't give Forestry companies incentive to become PEFC certified and to me the more companies that are certified the better it will be to achieve sustainable forestry. Companies that have PAGs and 3rd party audits will make the effort to do their best but companies that don't will just do the bare minimum.”</i></p>	<p>PEFC Canada reached out to provide more information on the PEFC Chain of Custody standard requirements around credit method, due diligence systems and PEFC claims, encouraged the individual to speak to the organization. As well as hosting a virtual meeting with concerned citizens in the community group.</p>



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<p>7.5.2.2 a) "...deal with consequences ..." . They suggest this is not professional language. I agree - it comes from the PEFC meta-standard where English is sometimes a challenge.</p> <p>A6.3.1.4 used Aboriginal vs Indigenous</p> <p>A 6.3.4.4 - What are examples of "unrelated to forest management?"</p> <p>A7.4.3 - needs sub bullets after the 7th bullet</p> <p>They also commented on a lot that they liked - such as A 6.3.4.4 "way better!" and 7.3.5 d - monitoring indicators once per cycle vs annual</p>	<p>Language updated 7.5.2.2 a) and suggested edits accepted.</p>
<p><i>"I was much encouraged, delighted, and inspired to read the introduction of the articles 1 through to 1.7. PEFC appears to encourage a higher standard of sustainable forest practices. The [Community Association] would like to see all forest companies to be encouraged to adopt PEFC Canada. With the impact of forestry on climate change, loss of biodiversity and water issues this paper is timely."</i></p>	<p>Thank you</p>
<p>Draw attention to the fact that stricter consideration must be given to the old forest in the future (concerns about harvesting of old growth Douglas fir and Western Red Cedar).</p>	<p>TC discussion at length and determined old growth is a specific issue to one area in Canada (coastal BC) and the standard applies across the country. Examples of old growth were added in the introduction and throughout the guidance to ensure the important topic is addressed in the areas of the country where it is relevant.</p>
<p>Questions related that could be considered by TC for inclusion/ improvement:</p> <ol style="list-style-type: none"> 1. standard has no provision for conflict resolution in relation to forest rights, is that correct? seems to only give oddly specific examples of situations that require conflict mediation, such as: conflicts resulting from integrating non-timber resources into the forest management planning, and Aboriginal and treaty rights. Why not just say "all conflicts with the local population and workers require a documented dispute mitigation and resolution process"? 	<p>7.4.3 b) complaints resolution process has been added to the standard.</p>

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<p><i>"From 2006 I became involved with the P. A.G., as a [community group] rep, with co-community reps. The "Voits review" took a lengthy time to determine our community effort to try to establish a full Forestry sustainability approach with the [organization]. Due to other commitments and family crisis issues I have not had sufficient time for fully reviewing your PEFC Draft. Professional from my past work, comments for drafts should never be "hurried for a one month" response especially for this important PEFC DRAFT to set a higher Sustainability Forest Management. It is now 1159 June 5, 2023 but the time just changed to June 6, Pacific time. On a very recent zoom meeting with other Forestry concerned citizens this Draft was not known to them. I regret that the contact person for this PEFC Draft had not advised me of your easier computer format to complete than what I was going to email to you."</i></p>	<p>Request for extension of time to comment was provided to June 19th. Invitation from the [community group] was made to PEFC Canada to speak with the community at a meeting about the draft standard (accepted but date not set).</p>
<p>June 19th multiple comments were received from a community group as edits and comments to the draft, below is a summary of comments:</p> <ul style="list-style-type: none"> • 1.1 Introduction - include tourism and old growth in list of values, include references to Official community plans and regional planning efforts suggested rewording, editorial suggestions; • 2.1 Standard Requirements - "for PAG meetings and for improving "targets of Voits of SFM h. All "Forestry" qualified personnel involved must maintain up-to-date, "professional, registrations," i.e RPF, biologists, hydrologists, engineers, technicians, etc. • 3 Definitions & Abbreviations – requested addition of: carbon retainment and carbon effects/ carbon dioxide emissions, Request to expand definition of watershed. Request to add "No clearcutting, only sustainable, selective, and renewable harvesting i.e. as done by Merv Wilkinson on his 77 acres at Cedar Vancouver" Island, BC., Canada" for forest conversion definition. Clarification on abbreviations • 4.3 Sale of Certified product – request to add restriction that certified companies cannot purchase non-certified logs 	<p>TC determined many of the comments made broaden the scope too much where it is meant to be general (in particular in the introduction), other comments were focused on issues relevant to a specific area and some comments were opinion; a detailed review was completed of the normative section and the Annex A guidance section to determine if the points/ issues are addressed elsewhere and at an appropriate level considering this standard is applicable nationally.</p> <p>Additionally, some of the concerns expressed were outside the scope of the standard as they are addressed in legislation or PEFC Chain of Custody standard.</p> <p>The following revisions were made based on this input:</p> <ul style="list-style-type: none"> • Watershed definition is updated. • Wild mushrooms is added as an example in A6.3.1.6 • 7.4.3 b) complaints resolution process has been added to the standard. • Definitions reviewed and updated • Abbreviations reviewed and updated • Annex A Guidance reviewed and updated



- 5.1 General requirements – suggested addition of requirement to liaise with community links for more decisions from all public persons, editorial suggestions A5.1 suggested addition of unclassified species
- 5.4 Process: basic operating rules for advisory groups – suggestion to add requirement to use 'Roberts Rules of Order for meetings'
- 6.3.1 Criterion 1 – biological diversity – suggestion to work with biologist for definition and addition of protection for a list of local flora & fauna, suggested addition of requirement not to contaminate waterways and no harvesting within 30m zone of all waterways.
- 6.3.2 Criterion 2 – Ecosystem condition and productivity – suggested addition of definition for ecosystem condition and productivity; Core indicator 2.1.1 suggested addition of 'deadline' for successful regeneration
- 6.3.3 Criterion 3 – Soil and water – suggested addition of 'clarity' to water quality; suggested definition per local Hydrologist
- 6.3.4 Criterion 4 – Role in global ecological cycles – comment to define Canadian specific cycles not just global, suggested addition regarding global scale of wildfire impacts
- 6.3.6.3 Element 6.2 — Safety – suggested addition of requirement for 'work safe' coverage or similar programs
- 6.3.7.3 Element 7.2 – Respect for Indigenous forest values, knowledge and uses – editorial suggestions
- 7.3.3 Rights and regulations – comment about local woodlot owner performance
- 7.5.4.2 Internal audit procedures – suggestion to add conduct requirements for auditors
- 7.7.2 Central entity responsibilities – suggested addition of education requirements

PEFC Canada reached out to provide more information on the PEFC Chain of Custody standard requirements around credit method and PEFC claims, encouraged the individual to speak to the organization.



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<p>Overall, the updates to the Standard are positive - the incorporation of higher expectations for Indigenous Peoples and the potential to use alternative processes for the current PAG's are changes we support. The expectations of CB's in Annex B are acceptable to us and in line with our current procedures as well as others Standards like SFI. Request for clarification/interpretations:</p> <ul style="list-style-type: none"> • Definitions and 5.5 (and A5.5) clarification on equivalent process, specifically would some of the Higher level landscape level planning process in BC work as only some stakeholders, maybe not full cross section? • are the "Equivalent" processes only applicable if a "functional PAG" is not achievable? I read this as the case, try to run a PAG first, and if this is not achievable, only then is an Equivalent process applicable? • PEFC's definition of "Forest Conversion" - we heard some interpretations at the SFI conference from the PEFC representative that were concerning - I was to ensure that the definition of "Forest Plantations" do not apply to general forestry practices in Canada. If a company plants one to two species and may or may not use site preparation or herbicides/other post-planting treatments, that these DO NOT meet the definition of Forest Plantations. My interpretation is that these forests are not plantations but where is the line there? • The requirement that Surveillance Audits "shall" be no longer than 12 months from the certification date. We strive for this but do not restrict ourselves this way in planning annual audits - the reality is that they may fall between 10-14 months depending on a variety of issues including client and auditor availability, other factors such as weather and fire, seasonal restrictions etc. While 12 months may be a goal, it should not be a "shall" and I would suggest this is a "should." 	<p>3.1 Definition, Advisory group or equivalent(s) – updated to reflect this is not one or the other, it can be in combination. Further guidance added for clarification in sections A5.1 and A5.5.</p> <p>Throughout document, revised 'equivalent' to 'equivalent(s).</p> <p>Added clarification, if a suitable, equivalent process is not currently in place, then best efforts to form a PAG.</p> <p>PEFC Definition of Forest Conversion – Canadian context explanation and examples are provided in A.6.3.4.4</p> <p>Section 1.6 edit to provide flexibility to audit timing (should be annually but shall not exceed 18 months)</p>