

Revision of the CSA Standard

CSA User Group Briefing Note - March 20, 2014

The purpose of this document is to provide a consistent message to all public advisory groups that are supported by the CSA User Group organizations. The User Group appreciates the knowledge that advisory groups have in the sustainable forest management process and its implementation with certification to CSA. As such, the advisory groups are a great resource in the continual improvement of the CSA Standard. The User Group encourages their input into the Standard revision process, helping to guide the CSA Technical Committee with direction that results in a Standard that remains globally recognized and desired by the Canadian forest industry.

1. Introduction to the CSA SFM Standard Revision Process.

The CSA standard remains current and relevant through an open, inclusive revision process that occurs roughly every five years.

In February 2013, the CSA Group Technical Committee (TC) on Sustainable Forest Management (SFM) reaffirmed CAN/CSA Z809-08 and CAN/CSA Z804-08 for three years. These two standards are designated National Standards of Canada (NSC) and are currently endorsed by the Programme for the Endorsement of Forest Certification (PEFC). PEFC endorsement of these standards is set to expire on June 29, 2016. To ensure continued endorsement of PEFC, post 2016, and to make required changes to these standards, the TC has proposed that new editions of the CSA Z809 and CSA Z804 standards be developed by CSA Group ("CSA").

To qualify as a consensus standard, a standard must be developed and approved by a broad group of affected parties or their representatives. CSA standards are developed by volunteer committees made up of representatives of groups such as manufacturers, government, consumers, academics, and others affected by the product or service covered by the standard. This ensures that no one group dominates the development.

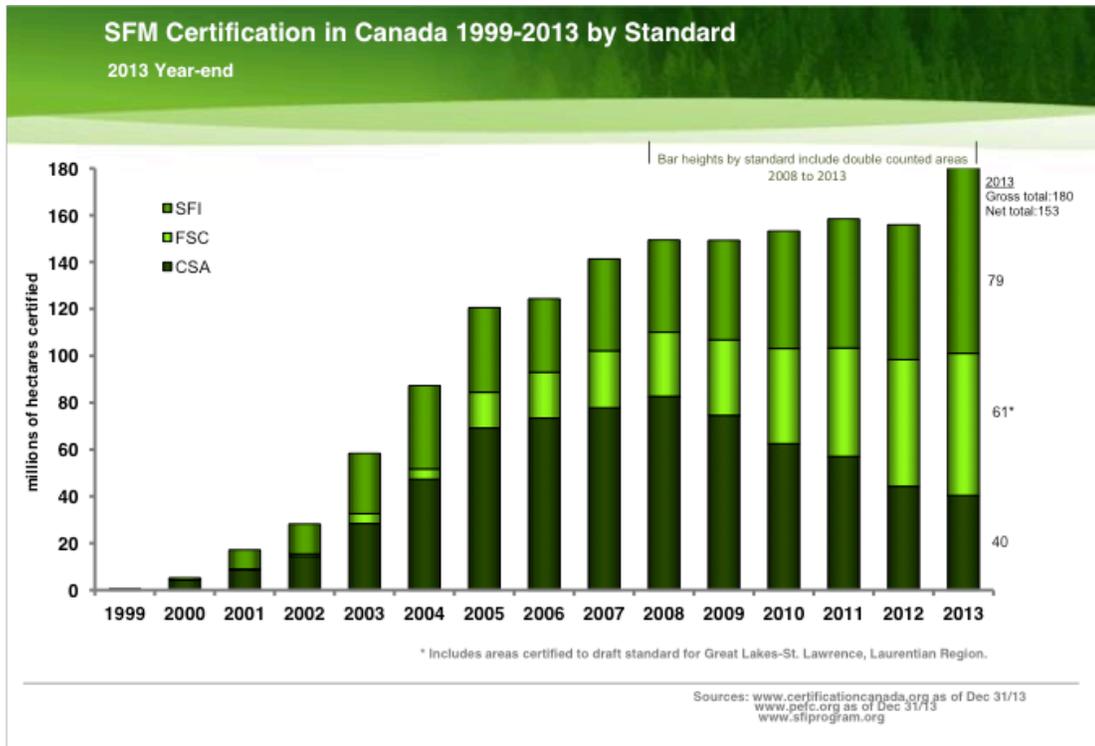
The CSA SFM User Group has agreed with the TC recommendation to develop a new edition of CSA Z809, and have indicated an interest in supporting its development.

2. Use of the CSA Standard within Canada

The CSA SFM Standard (CAN/CSA Z809-96) was initially developed in the mid 1990's. The first forest area certified to CSA occurred in May 1999 (northern Vancouver Island) and by the end of 2008, more than 80 million hectares were certified to CSA. The area certified to CSA in Canada was more than twice that certified to SFI and more than three times the area certified to FSC.

By the end of 2013, the amount of area certified to CSA was half of what it was in 2008 at just over 40 million hectares. Much of the CSA certified area became SFI certified as companies opted to embrace the SFI forest certification program. In eastern Canada, companies elected to have their previously CSA certified forests, certified to FSC.

The chart that follows demonstrates the change to certified area in Canada over time.



3. Moving Forward with CSA

Existing members of the CSA User Group have indicated they would like to continue supporting Canada's national forest certification Standard, CSA. While individual member companies can best explain their corporate reasons for this, User Group members in general like the integrity of the Standard and given it's applicability to public lands in Canada, the need to dialogue with local public advisory groups.

Having said that, companies see a need to make the CSA Standard more competitive with the other forest certification standards, without a loss in it's integrity. To that extent, the User Group will be making a submission to the CSA Technical Committee suggesting changes that will assist with that. Most of these changes will not alter the role of the public

advisory group or the primary content of the SFM Plan and annual reporting. Broadly, these changes cover the following items:

- a. Remove some of the ISO 14001 management system requirements found in the CSA Standard.

When the Standard was first designed in the mid 1990's, most forest companies did not have a formal environmental management system and thus it was felt that these requirements should be added to the Standard. Since that time, most industries and almost all forest companies in Canada have safety and environmental management systems, making these requirements in CSA duplicative and redundant. However once contained in the Standard, companies are forced to spend resources demonstrating to auditors (more than once) how these commitments are being met.

- b. Make the Standard more relevant to volume based forest tenures.

The CSA Standard's Defined Forest Area concept was initially based (1996) on a certification organization being largely responsible for forest management activities within it. This is a good fit for area-based licences and more of a forced fit for volume based licences. Based on Dec 2013 certification data, roughly ½ of the CSA certified area/volume can be attributed to each of the broad tenure categories, volume based and area based.

Long-term quantitative analysis for things like timber supply modeling is detailed, rigorous and expensive. It occurs at various scales for all forest estates in Canada. Forest companies generally lead this process (subject to government review and approval) on area-based tenures. Government generally takes the lead for areas where volume based tenures have been allocated. In these cases, the analysis is completed on an area that is generally larger than the area being certified (DFA area). Non-certified forest operations occur within the DFA, complicating forest management and the ability to report on indicators and targets.

While volume based certified organizations have managed to work within the CSA Standard framework, small changes to the Standard could reduce resource commitments to volume-based tenures by explicitly relying on existing government lead processes for assessing timber supply.

- c. Remove the requirement to forecast indicators.

When the standard was first developed, there were requirements for the organization seeking certification to determine indicators and targets for each of the SFM criteria and elements. The Standard also required that for each indicator, alternative strategies and forecasts (quantitative where possible) be completed. One substantive change that was made to the Z809-08 version of the Standard was the inclusion of core indicators – that would provide a common baseline for all SFM Plans across Canada. While the 2008 version of the Standard removed the requirement for alternate strategies, there remained a requirement to forecast all of these core indicators plus any other local indicators that were added to the SFM Plan. Forecasting (expectation is that it be quantitative) of these core indicators, has proven to be costly and time consuming – and in the end does not change how forest operations will be conducted on the ground to achieve targets. In the end, there are only a few core indicators that the certifying organization can realistically forecast.

Forecasting should not occur at the indicator level at all. Most core indicators cannot be quantitatively forecast and as is the case at present, more effort is spent explaining why forecasting cannot occur for the majority of indicators (evidence being sought by external auditors). The standard could require forecasting (quantitative analysis) occur at a broad forest management unit level (that would be applicable to the DFA) for sustainable rates of harvesting and demonstration that other resource values have been considered in the determination of the harvest level. This suggested change would make the CSA Standard expectations similar to those already in place for FSC and SFI certification programs.

- d. Remove the hard requirement to retaining a PAG that has a broad range of interested parties.

All organizations certified to CSA now have a fairly long history with their local public advisory group. In fact, some members of advisory groups have been involved in the process for more than 10 years. In this time, maintaining a PAG to the expectation in the Standard has proven to be difficult for most locations. The reality is that there are only a handful of people in most forest communities that are prepared to be actively involved in a voluntary public participation process – having a broad range of interested parties is a luxury that few PAG's maintain over time. It is important that there is a public process and folks from the community have the opportunity to participate if they express an interest. Certified organizations are well aware that having a broad and balanced group is ideal, but the Standard should not demand this. The emphasis of the public participation process should be continual improvement of the SFM Plan – reviewing performance and making adjustments as needed.

e. Retain requirements for Values, Objectives, Indicators and Targets (VOIT's).

At the core of the SFM Plan, is the establishment of VOIT's for all the SFM Criteria and Elements. In general, retain existing indicators and other requirements for the SFM Plan. Additionally, continue the annual reporting of performance against the indicators (achievement of targets). Re-opening the core indicator set is likely to create more discussion and quite probably result in increased effort to implement the revised requirements – without any real improvements in how forest planning and operations occur.

4. PAG Involvement with CSA Standards Revision

As occurred in the Z809-08 Standard revision process, advisory groups have the opportunity to suggest revisions to the standard, as individuals or collectively for the advisory group as a whole.

Suggested changes can be submitted to the CSA User group directly info@csasfmforests.ca or sent directly to Jonathan Fung, Project Manager, Natural Resources for the CSA Group jonathan.fung@csagroup.org

If desired, CSA has developed a web-based survey for receiving input into the Standard. The survey is available using the following link:
<https://www.surveymonkey.com/s/CSAZ809>

While it is desirable to receive advisory group input in advance of the initial CSA Technical Committee meetings (May 21 and 22, 2014), the User Group recognizes that this timeline might not meet the existing meeting schedule of existing advisory groups. Input into the process is can occur at any point in 2014.