

Controlled Wood Information Matrix

FSC Canada Support Document Rolling Draft – September 2007 Version 1.0

This paper is a “rolling draft,” meaning that it is being refined and improved on an ongoing and continual basis. FSC Canada welcomes comments on this paper, which should be sent to standards@fscCanada.org

This information matrix includes links to supplementary documents published by FSC Canada as well as external links to other websites. If those links are not active on the version of this document being consulted the links can all be accessed at FSC Canada’s website, at www.fscCanada.org/ControlledWood.htm

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Introduction

Growing public concern with global environmental and social issues has resulted in a greater need for forest products companies, corporations and governments to exercise social and environmental responsibility. FSC certification provides an independent assurance that forest management meets the highest standards, supporting environmentally appropriate, socially beneficial and economically viable forest management.

In many cases wood and paper products use wood from a variety of sources, some of them FSC-certified and some not. In these cases companies applying the FSC Mixed Sources label must ensure that the non-FSC-certified component of the product avoids sources deemed by FSC to be unacceptable in FSC-certified Mixed Sources products.

Two examples¹

1. A pulp mill accesses most of its supply from the FSC-certified forest management associated with the mill. However it also buys wood chips from several sawmills in the region. Since these chips are mixed in with the FSC-certified supply and sold with the “FSC Mixed Wood” label they must be controlled.
2. A furniture manufacturer produces a line of desks built with FSC-certified wood. The desks are sold with a variety of different knobs; one option the company offers is knobs made of cherry. No FSC-certified cherry is available. If the desk is to be sold with the “FSC Mixed Wood” label the cherry must be controlled.

The FSC Controlled Wood standards help FSC Chain of Custody (COC) certified companies avoid the use of unacceptable sources of wood in products carrying the FSC Mixed Sources label. Unacceptable sources include:

- a) illegally harvested wood;
- b) wood harvested in violation of traditional and civil rights;
- c) wood harvested in forests in which high conservation values are threatened by management activities;
- d) wood harvested in forests being converted to plantations or non-forest use; and
- e) wood from forests in which genetically modified trees are planted.

¹ These two examples become valid in January 2008, when new Controlled Wood requirements take effect.

Important Qualifications

1. The responsibility for determining whether or not a particular source of wood can be considered “low risk” or “controlled” rests with the applicant, subject to verification by an independent accredited certification body. FSC Canada does not designate particular sources of wood as “low risk” or “not low risk”. The information contained in this Information Matrix is intended to be *informative* rather than *definitive*.
2. FSC Canada does not assess forestry practices taking place at the forest management unit level to support assertions that the practises in that management unit either comply or do not comply with Controlled Wood requirements, since this would conflict with and undermine our core role as the agency responsible for developing national FSC standards. The information in this Information Matrix is limited to information at the broader national or ecoregional scales.
3. The FSC Controlled Wood standards are international documents, developed and approved by FSC International. FSC Canada does not have a mandate to interpret or redefine the requirements in those standards; therefore in this Information Matrix we have restricted ourselves to providing information that is directly relevant to what the standards specifically require.
4. This Information Matrix cannot be used in place of the actual standards; please refer to the standards themselves for definitive and complete descriptions of the requirements.
5. FSC Controlled Wood requirements are not intended to be comparable to the requirements for full FSC certification, and therefore are not meant to replace the need or incentive for forest managers to seek full certification according to FSC’s certification standards.
6. FSC places strict restrictions on the claims that can be made for controlled wood, which are described in Annexes to the standards. These restrictions limit claims about controlled wood to notices on invoices in business-to-business communications between companies holding FSC Chain of Custody certificates. FSC does not allow for on-product consumer labelling of wood as “controlled” nor for any public claims to be made about “FSC Controlled Wood.”

7. The volume of product that may be sold with the “FSC Mixed Wood” label is not affected by the volume of wood that has been controlled. The volume of product that can carry the FSC label is determined solely by the volume of actual FSC-certified fibre used in the manufacturing process.
8. This guidance document includes links to documents, most of which are published by external organizations, so the links are external links to websites not maintained by FSC Canada. We provide these links where we believe that the information is specifically relevant to the Controlled Wood requirements, but we make no assertion about the accuracy of the information contained on these external sites. If there are concerns about the factual accuracy or relevance of the information at those links, or if the links are no longer active, please inform FSC Canada, at standards@fsccanada.org.

Which standard?

The FSC Controlled Wood standard for forest management enterprises (FSC-STD-30-010) (<http://www.fsccanada.org/docs/4033A7427AF6A4D7.pdf>) allows forest management enterprises to provide evidence that the wood they supply has been controlled to avoid wood from the above categories. This wood may then be sold to manufacturers as FSC Controlled Wood.

The Standard for company evaluation of FSC Controlled Wood (FSC-STD-40-005) (<http://www.fsccanada.org/docs/E31E1C094092776C.pdf>) is intended for use by manufacturers seeking to demonstrate that the non-FSC certified wood that they purchase in order to mix with FSC-certified wood in the manufacture of FSC Mixed Sources labelled product has been controlled to avoid wood from the above categories.

FSC-STD-30-010 is designed for use by *forest managers* who wish to demonstrate that wood from the area that they have management responsibility for is controlled. FSC-STD-40-005 is designed for use by *manufacturers* (primary, secondary or tertiary), *timber traders* or *brokers* who are seeking to determine that the wood they purchase (but do not directly manage) can be considered as controlled. In this Information Matrix we refer to users of FSC-STD-30-010 as *forest managers*, and we refer to users of FSC-STD-40-005 (including manufacturers, timber traders and brokers) as *manufacturers*.

Sources do not need to be controlled to both standards. Once a source of wood has been controlled to either of these standards it remains controlled throughout the production, distribution and manufacturing chain, provided that the FSC Chain of Custody is intact.

Both standards allow for FSC-accredited National Initiatives (such as FSC Canada) to provide information to applicants seeking to implement Controlled Wood standards. This document has been developed in order to meet those expectations.

- Section A provides information for forest managers seeking to demonstrate that the wood they manage can be considered controlled, in which case it can be sold to manufacturers as controlled without the manufacturer having to take any additional steps. The standard that forest managers use is FSC-STD-30-010.
- Section B provides information to forest managers who have controlled the wood that they manage under FSC-STD-30-010, and who may wish to become fully FSC-certified to FSC Canada standards. This section indicates the general sections of FSC Canada Standards that correspond to (and expand on) the five Controlled Wood categories.
- Section C provides information for manufacturers seeking to control the sources of wood that they purchase in accordance with FSC-STD-40-005. In particular, this section provides relevant information that can be used by manufacturers when making risk assessments of wood from Canadian sources.

Section A – Information for forest managers seeking to use FSC-STD-30-010

A forest manager can obtain Controlled Wood certification on lands that it manages, which can then be sold to FSC Chain of Custody holders as Controlled, which means that the COC holder will not need to undertake its own measures to control the wood. Forest managers who wish to demonstrate that the wood they manage has been controlled must use FSC-STD-30-010². This section of the Information Matrix provides a summary of the specific requirements for each Controlled Wood category, and provides examples of potential means of verification in Canada. Please refer to FSC-STD-30-010 for the comprehensive and authoritative requirements.

The tables below provide information pertaining to Controlled Wood requirements for large operations. The requirements for Small and Low Intensity Forests (SLIMFs) are different; please refer to Annex 2 of FSC-STD-30-010 for the requirements that pertain to SLIMFs.

Category 1: Illegally harvested wood

Requirement for forest managers using FSC-STD-30-010	Potential sources of evidence ³
The forest manager shall demonstrate that harvesting in the forest management district included in the scope of evaluation for compliance with this standard takes place in compliance with all laws applicable to harvesting in the jurisdiction in accordance with the following criteria:	
a) Evidence of legal authority to harvest	License, harvesting permit or property title
b) Evidence of compliance with applicable management planning requirements	Approved management plan
c) Specification of applicable harvesting restrictions	Approved management plans
d) Evidence that timber is harvested from authorized areas	Maps
e) Evidence of sales	Sales contracts, invoices

² This is also a requirement for FSC-certified companies who use the Excision Policy to remove a portion of their land base from the FSC-certified area. The forests that have been removed must be controlled using FSC-STD-30-010.

³ Sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

f) Evidence of payment of royalties or other fees	Official records
g) Evidence of compliance with applicable provisions of the requirements of CITES	No Canadian commercial tree species are listed in CITES Appendices I-III (www.cites.org/eng/resources/species.html)
h) Evidence of compliance with requirements in relation to transportation of timber	Transport documents
The manager shall demonstrate that species, qualities and quantities are classified and measured according to legally-prescribed or acceptable standards in the jurisdiction.	Official records

Category 2: Wood harvested in violation of traditional and civil rights

Requirement for forest managers using FSC-STD-30-010	Potential sources of evidence ⁴
There is no evidence of violation of the ILO Fundamental Principles and Rights at Work in the forest management district.	"Evidence of no evidence" is difficult to obtain. However, where there is evidence that the manager is in violation of the ILO Fundamental Principles and Rights at Work notice should be provided to certificate holders and/or the Certification Bodies and/or FSC.
There are no conflicts with the forest manager relating to land tenure or land use rights of traditional or Aboriginal peoples for which a resolution process has not been agreed by the main parties to the dispute.	The resolution of land use rights in Canada is typically carried out through governmental processes. Information about current and completed processes is at www.ainc-inac.gc.ca/pr/trts/hti/site/mainindex_e.html
There is no evidence of violation of ILO Convention 169 on Indigenous and Tribal Peoples	"Evidence of no evidence" is difficult to obtain. However, where there is evidence that the manager is in violation of ILO Convention 169 on Indigenous and Tribal Peoples notice should be provided to certificate holders and/or the Certification Bodies and/or FSC.
The manager shall implement a consultation process to identify potential conflicts relating to land tenure and land use rights of traditional or Aboriginal peoples in the areas affected by the manager's operations.	Documentation of public participation carried out in accordance with provincial or other certification requirements
In cases where a dispute resolution involving the forest manager process is in place the manager shall provide evidence of the process by which any disputes are being resolved, and which outlines an agreed interim	Process documentation, where applicable

⁴ Sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

process for addressing the dispute and for the management of the forest area concerned	
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Category 3: Wood harvested in forests in which high conservation values are threatened by management activities

Requirement for forest managers using FSC-STD-30-010	Potential sources of evidence⁵
Records of an assessment appropriate to the size of the forest management district and intensity of management, to identify the presence of high conservation values.	<ul style="list-style-type: none"> - Rapid ecological assessment - Environmental or social impact assessment - Wildlife census - Natural heritage data - Mapping of special sites
Evidence of consultation with stakeholders, including NGOs and parties that are involved with or have an interest in the forest area, in relation to identifying HCVs and threats to them, with respect to social or environmental aspects. Where relevant, the assessment shall include consultation with representatives and members of communities and Aboriginal peoples living in or adjacent to the forest management district.	<ul style="list-style-type: none"> - Minutes of meetings - Letters of invitation - Photographs - Documentation of public participation carried out in accordance with provincial or other certification requirements
A list of the high conservation values thus identified in the forest management district, together with evidence indicating that these high conservation values are not threatened in the forest management districts.	<ul style="list-style-type: none"> - Values, Indicators, Objectives and Targets compiled to support CSA SFM Critical Element 1.4 pertaining to Sites of Special Biological Significance - Evidence of compliance with Objective Six of the SFI standard, pertaining to identifying and appropriately managing lands that are ecologically, ecologically, historically or culturally important

Category 4: Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest use

Requirement for forest managers using FSC-STD-30-010	Potential sources of evidence⁶

⁵ Sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:	
a) Entails a very limited portion of the forest management district;	FSC Canada national standards typically have a limit of 5%
b) Does not occur on high conservation value forest areas; and	HCVF assessment
c) Will enable clear, substantial, additional, secure long term environmental and social benefits across the forest management district.	Management plan

Category 5: Wood from forest management units in which genetically modified trees are planted

Requirement for forest managers using FSC-STD-30-010	Potential sources of evidence ⁷
No planted genetically modified trees are present in the management district	Provide source indicating that any planted genetically modified trees in Canada are in confined trials (i.e., not in any forest management districts)

⁶ Sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

⁷ Sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

Section B – Information for forest managers who have Controlled Wood certification to FSC-STD-30-010, and who wish to become fully certified to FSC Canada standards.

FSC anticipates that there may be situations in which a forest manager that has previously met the requirements for Controlled Wood (FSC-STD-30-010) may subsequently decide to seek full certification, using the applicable FSC National Standard. In the section below we provide references to the relevant requirements pertaining to each of the FSC Controlled Wood categories from FSC Canada’s standards.

Please refer to the standards themselves for accurate and comprehensive descriptions of their requirements.

Maritimes Standards	www.fscCanada.org/maritimes.htm
Great Lakes/St. Lawrence Standard	In development; current draft at www.fscCanada.org/glsL.htm
Canadian Boreal Standard	www.fscCanada.org/nationalboreal.htm
B.C. Standards	www.fscCanada.org/britishcolumbia.htm

Controlled Wood requirement	Relevant requirements in FSC National Standards
Illegally harvested wood	Principle 1
Wood harvested in violation of traditional and civil rights	Principle 2 and 3
Wood harvested in forests in which high conservation values are threatened by management activities	Principle 9
Wood harvested in forests being converted to plantations or non-forest use	Criteria 6.10 and 10.9
Wood from forests in which genetically modified trees are planted	Criterion 6.8

Section C – Information for manufacturers seeking to control sources to FSC-STD-40-005

This Section is for use by manufacturers, traders or brokers who have an FSC Chain of Custody, who handle FSC-certified wood and who wish to control non-certified sources in order to mix them with FSC-certified wood and sell resulting products as “FSC Mixed.”

There are three ways that an FSC Chain of Custody company can control its non-FSC certified wood sources:

1. Purchase wood from forest enterprises that have been verified by an FSC accredited Certification Body to meet the requirements of FSC-STD-30-010;
2. Purchase FSC Controlled Wood from suppliers holding a valid FSC Chain of Custody certificate which includes an FSC Controlled Wood registration code; or
3. Internally verify its wood sources according to the requirements of FSC-STD-40-005.

The guidance in this Section is intended to support companies seeking to use the third option.

Other users, such as forest managers, should refer to Section A.

General Methodology

The methodology outlined below should be used for each of the five controlled wood categories (although see Category 3 on Threatened High Conservation Value Forests for a slight variation on this methodology). The six steps below summarize the general methodology; in the following sections we provide relevant information to help applicants go through the necessary steps for each Controlled Wood category. It's important to note that it may not be necessary to carry out all six steps. If a “low risk” designation can be made in either Step Two or Step Four for any Controlled Wood category it is not necessary to proceed further with respect to that particular category.

Step One: Identify the Country of origin. This Information Matrix has been developed to help in assessing risk for wood that is sourced from Canada. If the country of origin cannot be identified then the material cannot be designated as controlled unless it has already been designated as controlled at an earlier stage.

Step Two: Go through the “risk indicators” in Annex 2 of FSC-STD-40-005 for each Controlled Wood Category. Is there evidence that the indicators for a particular category are met *at the country level*? Where a category has multiple indicators then evidence must be obtained for all indicators, unless otherwise specified.

If the evidence does exist then the wood can be considered as “low risk” for that particular category, and no further investigation is required. If the evidence does not exist then go to Step Three.

Step Three: Identify the province, ecoregion or forest management district of origin.

Step Four: Go through the indicators for any Controlled Wood category that has not been determined to be “low risk” in Step 2. Is there evidence that these indicator(s) are complied with at the provincial, ecoregion or forest management district level?

If the evidence does exist then the wood can be considered as “low risk” for that particular category, and no further investigation is required. If the evidence does not exist then go to Step Five.

Step Five: Identify the Forest Management District of origin.

Step Six: Carry out the verification program outlined in Annex 3 of FSC-STD-40-005 for any categories not designated “low risk.” Annex 3 describes the field verification that must be carried out in the case of sources that cannot be considered low risk for all five Controlled Wood categories. Field verification is required for a sample of the sources that are not low risk. The Annex goes on to describe the specific types of evidence that should be obtained in order to demonstrate that a particular source can be considered Controlled, even though it does not come from a low risk region. This evidence is required only for those categories that have not been designated as low risk.

Below we provide information to help manufacturers assess whether or not a particular source of wood can be designated as low risk for each of the five Controlled Wood categories. Where relevant we provide additional information to help manufacturers determine whether or not sources of wood from “non-low-risk” areas may be designated as Controlled, in accordance with the requirements of Annex 3 of FSC-STD-40-005.

Important note on the “risk assessment” approach: The purpose of the risk assessment approach is to lower the likelihood of wood from controversial sources entering into the FSC supply chain. It is *not* designed to eliminate that possibility, which would not be feasible without direct on-site verification in each case, and such direct verification is not practical for a manufacturer who has no direct control of forest management, buys wood from dozens or even hundreds of sources and may be thousands of kilometres and several purchasing steps removed from the source of the wood. FSC recognizes that designating a country or a region as “low risk” does not necessarily mean that there are no infractions in particular management units within that region. It simply means that the risk is low.

If a valid assessment of low risk can be made at a national or sub-national level the manufacturer is not obliged to seek out and assess evidence that might point to a violation of one or more of the requirements in Annex 3 of FSC-STD-40-005 in a particular forest management district that the manufacturer is purchasing from. However, the manufacturer is required to address any specific complaints that may be lodged with the manufacturer, using the complaints mechanism described in Section 14 of FSC-STD-40-005 and summarized below.

Complaints mechanism

Given that “low risk” does not mean “no risk,” it is to be expected that situations may arise in which a particular supply has been designated as low risk on the basis of a country-wide or sub-national risk assessment, but where there is evidence that the forest manager is out of compliance with one or more of the requirements in Annex 3 of 40-005. Any interested party may bring this specific evidence to the attention of a manufacturer who has made a low risk designation for wood that it purchases from that management district. The manufacturer must then assess the evidence, ensure that a field assessment is carried out if the evidence warrants and exclude that supplier from the company’s FSC Controlled Wood category if any non-compliance with FSC Controlled Wood requirements is found. Please refer to Section 14 of FSC-STD-40-005 for a more complete description of the complaints mechanism.

Category 1: Illegally Harvested Wood

Forest management in Canada is governed by thousands of regulations that are issued by scores of agencies at the federal, provincial and municipal levels, including agencies responsible for natural resources, fisheries, water, heritage, tourism, Aboriginal rights, labour, revenue, health and occupational safety, among others. It is not the intent of this guidance document to anticipate and measure the extent to which all of these regulations are adhered to. The main thrust of FSC's emphasis on legality in 40-005 is outlined in Annex 3, which lists ten requirements and relevant evidence of meeting those requirements, including: licences or harvesting permits; approved management plans; documentation of legal restrictions; maps and harvest records; and contracts and invoices.

The district of origin may be considered low risk in relation to illegal harvesting when all of the following indicators related to forest governance are present:

	Sources of information ⁸	Comments															
1.1 Evidence of enforcement of logging related laws in the district	Canadian Council of Forest Ministers maintains data on national Criteria and Indicators at www.ccmf.org/current/ccitf_e.php The 2005 National Status Report includes data on Indicator 6.4.2 (Rate of compliance with sustainable forest management laws and regulations), which is summarized to the right.	<p>Numerical data is available for 2002/03 on the four provinces (BC, AB, ON, QC) that together comprise about 80% of Canada's total annual harvest volume of 193.7 million m³.</p> <table border="1"> <thead> <tr> <th>Jurisdiction</th> <th>No. of checks</th> <th>No. not in compliance</th> </tr> </thead> <tbody> <tr> <td>BC</td> <td>21225</td> <td>506</td> </tr> <tr> <td>AB</td> <td>3848</td> <td>15</td> </tr> <tr> <td>ON</td> <td>9311</td> <td>768</td> </tr> <tr> <td>QC</td> <td>145,639</td> <td>20,957</td> </tr> </tbody> </table> <p>Percentage compliance rates are 92% in Ontario and 86% in Quebec. In Alberta and B.C. there is no direct correlation between inspections and infractions in a given year.</p>	Jurisdiction	No. of checks	No. not in compliance	BC	21225	506	AB	3848	15	ON	9311	768	QC	145,639	20,957
Jurisdiction	No. of checks	No. not in compliance															
BC	21225	506															
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⁸ The sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

<p>1.2 A robust and effective system of licensing, harvest permits, and other documentation demonstrating legality of harvests and wood purchases are present in the district.</p>	<p>Global Forest Watch data shows Canada's forested landscape in relation to commercial forest tenure zones. (http://www.fsccanada.org/docs/73ceecfa79144a46.pdf)</p>	<p>There is no large-scale harvesting taking place in the region north of the commercial forest tenure zone. The forests south of the commercial forest tenure zone are largely privately owned.</p>
<p>1.3 Little or no evidence or reporting of illegal logging in the district of origin.</p>	<p>FSC Canada has not documented or received evidence that a significant percentage of the 900,000 hectares harvested annually in Canada fails to meet the requirements of Annex 3 of FSC-STD-40-005.</p>	<p>"Evidence of no evidence" is difficult to obtain. However, where there is evidence that Controlled Wood is being sourced from areas that fail to meet the requirements of Annex 3 notice should be provided to certificate holders in accordance with the complaints procedures in Section 8.</p>
<p>1.4 Low perception of corruption related to harvesting permits and related law enforcement.</p>	<p>Transparency International maintains regularly updated information on perceptions of corruption at the national level (www.transparency.org/)</p>	<p>In the 2006 Corruption Perceptions Index, Canada rates 14th out of 163 countries surveyed. Forestry countries that rate higher include Finland (1), Sweden (6), Norway (8) and Australia (9). Forestry countries that rate lower include Germany (16), France (18), U.S.A. (20), Poland (61) and many others</p>

If there is specific evidence that wood that has been designated as "low risk" is in fact being harvested in violation of the requirements in Annex 3 of FSC-STD-40-005, then this evidence can be provided to any manufacturer who will take investigative and corrective action in accordance with the complaints mechanism outlined in Section 14 of the standard.

Category 2: Wood harvested in violation of traditional or civil rights

The district of origin may be considered low risk in relation to the violation of traditional and civil rights when all of the following indicators are present:

Indicator	Sources of information ⁹	Comments
2.1 There is no UN Security Council ban on timber exports from the country concerned	There is currently no U.N. Security Council ban on timber exports from Canada	
2.2 The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber)	Canada is not designated as a source of conflict timber	
2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned	Forest employment in Canada is regulated under federal and provincial labour codes, which prohibit child labour, protect the rights of workers to organize and are consistent with other ILO provisions.	“Evidence of no evidence” is difficult to obtain. However, where there is evidence that Controlled Wood is being sourced from areas that fail to meet the requirements of Annex 3 notice should be provided to certificate holders in accordance with the complaints procedures in Section 14 of FSC-STD-40-005.
2.4 There are recognized and equitable processes ¹⁰ in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district	For a summary of historic land claims processes see www.ainc-inac.gc.ca/pr/trts/hti/site/mainindex_e.html	There are 12 Historic Treaties, signed between 1850 and 1923.

⁹ The sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

¹⁰ A process in which there are functioning means of recourse and/or there are not overwhelming structural imbalances or inherent unfairness. Examples of processes include land claims negotiations, judicial procedures and treaty negotiations

¹¹ Indigenous people, workers, communities and government within the district accept and endorse the structure for addressing and resolving these issues; and communities and/or indigenous peoples have recognized power to mitigate any threats of harvesting through legal systems or other authority.

traditional cultural identity in the district concerned ¹¹ .	For information about recent self-government and land claims agreements see www.ainc-inac.gc.ca/pr/agr/index_e.html#Self-GovernmentAgreements	In the modern-day treaty process there are two main types of agreement (Comprehensive Land Claims and Self Government Agreements), with typically three stages in the negotiation process (Framework Agreement, Agreement in Principle and Final Agreement). On Comprehensive Land Claims in Canada there are currently 9 Framework Agreements, 9 Agreements in Principle and 30 Final Agreements. On Self Government Agreements there are currently 9 Framework Agreements, 16 Agreements in Principle and 24 Final Agreements.
	For a summary of Canadian high court decisions from the past twenty years that pertain to Aboriginal and Treaty Rights (http://www.fsccanada.org/docs/927c228894a2eb8b.pdf)	At the risk of oversimplifying the information contained in this summary of high court decisions regarding Aboriginal Rights, it is fair to say that in recent decades in Canada the Supreme Court, in clarifying the nature and extent of Aboriginal and Treaty Rights, have consistently “moved the yardsticks” for Canadians as a whole with respect to recognizing and respecting these rights.

The information above supports the assertion that in Canada there are recognized and equitable processes in place to resolve outstanding disputes of significant magnitude pertaining to traditional rights. ***This does not mean that there are no controversies regarding traditional rights in Canada, nor that traditional rights are in every case being fully respected and implemented.*** It only means that Canada has in place and is implementing fair processes to adjudicate those rights. Neither FSC nor FSC-accredited Certification Bodies have a mandate to adjudicate these rights.

The low risk designation can only be used by manufacturers; forest managers seeking to demonstrate compliance with Controlled Wood requirements must use FSC-STD-30-010 and provide specific documentation of compliance with the relevant requirements. See Section A of this Information Matrix. And forest managers seeking to become FSC certified will need to meet all requirements of the applicable national standard (in particular those pertaining to Principles 2 and 3). See Section B of this Information Matrix.

If there is specific evidence that wood that has been designated as “low risk” is in fact being harvested in violation of the requirements in Annex 3 of FSC-STD-40-005, then this evidence can be provided to any manufacturer who will take investigative and corrective action in accordance with the complaints mechanism outlined in Section 14 of the standard.

Category 3: Wood harvested from forest in which high conservation values are threatened by management activities

Methodology notes for assessing HCVF risk:

The methodology for assessing risk in this category is outlined below. The toolkit then provides more detailed information to help address each of these six steps in the Canadian context.

Step One: Determine the *ecoregion* or ecoregions that the wood comes from.

Step Two: Are there globally, nationally or ecoregionally significant High Conservation Values in this/these ecoregion(s)?

If NO, the material can be considered “low risk” for this category; if YES go to Step 3.

Step Three: Are the globally, nationally or ecoregionally significant High Conservation Values potentially *threatened* by forest management activities?

If NO, the material can be considered “low risk” for this category; if YES go to Step 4.

Step Four: Is there a strong system of protection (effective protected areas and legislation) in place in the ecoregion that ensures the survival of the High Conservation Values in the region?

If YES, the material can be considered “low risk” for this category; if NO go to Step 5.

Step Five: Section 3.2 of Annex 3 of FSC-STD-40-005 describes the evidence to be provided in cases where a low risk designation cannot be made.

Relevant terms and definitions

A note on scale: FSC International typically uses the term “regional” to mean “potentially encompassing more than one country.” In FSC Canada standards, on the other hand, the term “regional” is used to refer to a region smaller than the national scale. In order to

avoid confusion in this Information Matrix the term “regional” is used in its international meaning, referring to a scale larger than the national scale. The term “provincial” is used to refer to a scale below the national level, but larger a single forest management district.

Ecoregion: A large area of land or water that contains a geographically distinct assemblage of natural communities that:

- (a) share a large majority of their species and ecological dynamics;
- (b) share similar environmental conditions, and;
- (c) interact ecologically in ways that are critical for their long-term persistence.

The FSC International definition of ecoregion includes as an example the global set of ecoregion definitions used by WWF International, available at www.worldwildlife.org/science/ecoregions.cfm. This is the set of ecoregion definitions used in this Information Matrix, and we have prepared a map of Canadian Ecoregions Containing Forest Landscapes.

(<http://www.fsccanada.org/docs/73ceecfa79144a46.pdf>) Other ecoregion definitions (such as Rowe’s Forest Ecoregions) may be used for the purposes of meeting Controlled Wood requirements in Canada.

High Conservation Value Forests (HCVF): High Conservation Value Forests are those that have one or more of the following attributes:

- a) forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance
- b) forest areas that are in or contain rare; threatened or endangered ecosystems;
- c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control); or
- d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities

For the purpose of an ecoregion-scale risk assessment only categories (a) and (b) are normally applicable, since categories (c) and (d) can only be assessed at the forest management district scale. When carrying out an HCVF assessment at the level of a forest management unit then all four categories are applicable.

Threatened: Having an uncertain chance of continued survival. In this standard, it should be considered at the ecoregion level for HCVF.

Information to support the HCVF methodology

Step One: Determine the ecoregion

There are a number of acceptable ways to divide Canada into different ecoregions, and FSC does not require using a particular set of ecoregion definitions or boundaries. The information in this Matrix is based on the ecoregions described by WWF International and available at www.worldwildlife.org/science/ecoregions.cfm. The WWF list of terrestrial ecoregions include about 32 ecoregions in Canada that contain forests (some of them straddling the Canada-U.S. border).

Step Two: Identify High Conservation Forests at the ecoregion level

FSC International provides two international sources of information about significant HCVFs at the ecoregion scale. FSC Canada's national standards include toolkits for identifying High Conservation Value forests in Canada, but these toolkits are largely geared towards meeting FSC Canada's HCVF requirements for full FSC certification at the forest management district scale, i.e., a much finer scale than what is required during a risk assessment under FSC-STD-40-005. However, FSC Canada's toolkits do include guidance for identifying globally, nationally and provincially significant intact forests, and these guidelines are used in the intact forest information provided below.

Conservation International's "Global Hotspots": Information about Conservation International's Global Hotspots program is at www.biodiversityhotspots.org/xp/Hotspots/hotspots_by_region/Pages/default.aspx. None of the Global Hotspots identified by Conservation International are in Canada.

WWF Global 200 Regions: WWF International has identified 200 terrestrial, aquatic and marine ecosystems around the world that warrant special consideration, which are described in the "Global 200" program, at www.worldwildlife.org/science/ecoregions/g200.cfm. The forest regions within Canada are:

- Muskwa-Slave Lake Boreal Forests, straddling north-eastern B.C., north-western Alberta and the Mackenzie Valley in NWT
- Pacific Temperate Rain Forest, which includes two ecoregions in Canada, the British Columbia Mainland Coastal Forests and the Central Pacific Coastal Forests (which includes Vancouver Island)

These ecoregions are identified on the map of Canadian Ecoregions Containing Forest Landscapes.

(<http://www.fsccanada.org/docs/24f3bca1fbdf9762.pdf>) Other "Global 200 Ecoregions" in Canada include the Canadian Taiga, the

Alaskan North Slope Coastal Tundra, the Canadian Low Arctic Tundra and the Northern Prairie, but these ecoregions do not support commercial forestry operations and so are not considered further here.

Intact forests in Canada

The links below are to maps of intact forests in Canada, identified at the three different thresholds that have been established by FSC Canada for determining intact forests.

- Globally significant intact forests are intact forests larger than 500,000 hectares
(<http://www.fsccanada.org/docs/ed660c7393daadf1.pdf>)
- Nationally significant intact forests are intact forests larger than 200,000 ha.
(<http://www.fsccanada.org/docs/c51089fe42270d0c.pdf>)
- Provincially significant intact forests are intact forests larger than 50,000 ha.
(<http://www.fsccanada.org/docs/73ceecfa79144a46.pdf>)

The information above should help manufacturers determine if there are major High Conservation Value Forests at the ecoregion scale in the ecoregion(s) that the manufacturer is sourcing wood from. If there are not, then the supply can be considered “low risk” with respect to HCVPs. If there are ecoregionally significant High Conservation Value Forests in the ecoregion(s) then the manufacturer should proceed to the next two steps, which provide criteria to determine whether the supply might be considered low risk in spite of the presence of High Conservation Value Forests in the same ecoregion.

Step Three: Are the nationally or globally significant High Conservation Values potentially threatened by forest management activities?

In this standard a High Conservation Value Forest is considered to be “threatened” when it has an uncertain chance of continued survival in the ecoregion. In other words, logging in intact forests does not necessarily threaten the continued survival of intact forests in that ecoregion, as long as the High Conservation Value continues to exist in the ecoregion.

Part B: Determining if “WWF Global 200” ecoregions are threatened: WWF carries out regular status assessments of the Global 200 ecoregions, which are provided below for the two “Global 200” forest regions within Canada:

- Muskwa-Slave Lake Boreal Forests, straddling north-eastern B.C., north-western Alberta and the Mackenzie Valley in NWT.
Current status: “Relatively Stable/Intact”

- Pacific Temperate Rain Forest, which includes two ecoregions in Canada, the British Columbia Mainland Coastal Forests and the Central Pacific Coastal Forests (which includes Vancouver Island)
Current status: "Critical/Endangered"

Part B: Determining if intact forests are threatened: This section outlines one way to determine when an intact forest is threatened with forest management activities. This is not necessarily the only acceptable methodology for carrying out an assessment of "threat" in this context.

The assessment below is based on two general assumptions:

- a) forests outside of forest tenure zones are not at risk of impact from forest management activities; and
- b) forests within forest tenure zones are potentially at risk of impact from forest management activities¹².

Global Forest Watch has prepared a database of intact forests by ecoregion and tenure status.

(<http://www.fsccanada.org/docs/37b60f3055cda17c.pdf>) This assessment has been done at three scales of "intactness": greater than 500,000 ha (globally significant), greater than 200,000 ha (nationally significant) and 50,000 ha (provincially significant). Below is a summary table extracted from the comprehensive spreadsheet, showing ecoregions in which the total area of intact forest is above a particular threshold, but the total area outside the forest tenure zone is below that same threshold.

WWF Ecoregion	Total area of intact forest	Intact forests in non-tenured areas
Ecoregions containing globally significant intact forests (>500,000ha), with less than 500,000 hectares in non-tenured zones		
Cascade Mountain leeward forests	1,073,900	424,900
Central British Columbia Mountain forests	3,321,100	391,600
Northern transitional alpine forests	1,999,200	56,900
Pacific Coastal Mountains icefields and tundra	1,361,800	46,600

¹² FSC Canada recognizes that these working assumptions are imprecise. In particular, assumption (b) is only valid if all intact forests within the forest tenure zone are at risk of being logged; this assumption takes no account of protected areas, special areas where logging is deferred or non-commercial forests where no logging is planned. This assumption provides the basis for a conservative approach to assessing the threat to intactness in an ecoregion. With additional ecoregion-specific information it may be possible to refine these assumptions.

Western Great Lakes forests ¹³	508,800	453,000
Ecoregions containing nationally significant intact forests (>200,000ha), with less than 200,000 hectares in non-tenured zones		
Northern transitional alpine forests	2,037,600	56,900
Pacific Coastal Mountain icefields and tundra	1,718,600	46,800
Ecoregions containing provincially significant intact forests (>50,000ha), with less than 50,000 hectares in non-tenured zones		
Pacific Coastal Mountain icefields and tundra	1,864,000	49,500

The above table lists the ecoregions in which there are globally, nationally or provincially significant intact forests, and where there is insufficient intact forests outside of the tenured forest zone to ensure that the area of intact forest will be maintained above the specific threshold. By implication, ecoregions not listed above do not have globally, nationally or provincially significant intact forests that are threatened by forest management activities at the ecoregion level. This table does *not* necessarily mean that all forestry in these ecoregions threatens the continued existence of intact forests. It does, however, show ecoregions where the continued existence of globally, nationally or provincially significant intact forests would be threatened *if* all intact forests within the tenured forest zone were to be logged.

Step Four: Is there a strong system of protection (effective protected areas and legislation) in place in the ecoregion that ensures the survival of the HCVs in the region?

The risk to the continued existence of High Conservation Value Forests in an ecoregion can be considered as low if there is a strong system of protection in place to protect the value in areas that are not subject to forest management activity.

FSC does not have a specific threshold that would clearly indicate whether a system of protection is “strong” or not, but we can offer two suggestions of what it should *not* mean:

- The fact that a provincial government asserts that it has a strong system of protection does not necessarily mean that a strong system is in place. Assertions made by governments are often tailored to specific audiences, and may or may not be

¹³ This ecoregion extends into the United States, but the figures provided reflect only the area in Canada.

supported by strong factual evidence or reflect a broad consensus about the degree of protection in a province or region of a province.

- Likewise, the fact that NGOs are advocating for further protection is not conclusive evidence that a strong system is *not* in place. A strong network of protected areas can always be improved upon.

In other words, there is no single entity that controls what “strong” means in this case, so there is no authority that can give a definitive ruling on this matter. Furthermore, a manufacturer using FSC-STD-40-005 will usually not be in a position to determine at first hand whether or not there is an adequate system of protection (such as by carrying out a gap analysis). It will be necessary to consult and document existing readily available information, such as (but not necessarily limited to):

- a) Percentage of the ecoregion in protected areas
- b) Degree of protection compared with the degree of protection in neighbouring jurisdictions
- c) Recent and current activities to increase protection
- d) Results of recent published, peer reviewed gap analyses
- e) Information provided by interested parties (NGOs, Aboriginal communities, etc)

Example: British Columbia Mainland Coastal Forests

This region is in the WWF “Global 200” and its status is “Critical/Endangered.” Is there a strong system of protection in the region, which would allow for a low risk designation? FSC is not the arbiter of this, but one example of evidence to support such a conclusion is provided by Greenpeace, which reports a “comprehensive solution” including the protection of 2 million hectares of the Great Bear Rainforest (www.greenpeace.org/canada/en/campaigns/greatbear/latest/great-bear-victory).

Note that the information above would apply only to the British Columbia Mainland Coastal Forests, and not to the Central Pacific Coastal Forests (i.e. Vancouver Island), since although both ecoregions are part of the same WWF “Global 200 Region” (the Pacific Temperate Rain Forest), the HCVF risk assessment must be done on an ecoregion basis. In other words, the existence of a strong system of protection in the Great Bear Rainforest would only mean that the B.C. Mainland Coastal Forest ecoregion can be considered low risk; this assessment could not be applied to assessments in other regions of British Columbia or Canada.

Step Five: Determine the forest management district of origin

If, after carrying out the above four steps the manufacturer is unable to make a low risk designation for a particular source of wood it will be necessary to complete Step Six below, and before that can be done it will normally be necessary to identify the forest management unit that the supply comes from. Under certain circumstances it may be sufficient to identify the company, if it is

possible to ascertain that the company adopts a consistent approach to HCVF conservation across all forest management districts that the wood could potentially come from, and that this approach is consistent with the requirements of Section 3.2 of Annex 5 of FSC-STD-40-005.

Step Six: Annex 3 of FSC-STD-40-005 describes the evidence to be provided in cases where a low risk designation cannot be made

Annex 3 of FSC-STD-40-005 describes the procedures for a company implementing Controlled Wood verification from areas that cannot be classified as low risk. Below is a summary of the key elements that apply to the category of High Conservation Value Forests; refer to the standard for the complete requirements.

The company will need to obtain specific evidence of compliance with Controlled Wood requirements, but only for a sample. For example, if the company is purchasing wood from ten different forest management districts that cannot be designated as low risk for threatened High Conservation Value Forests, three of those ten sources will require specific documentation of compliance with the requirements in the table below:

Requirement (from Section 3.2 of Annex 3 of FSC-STD-40-005)	Potential sources of evidence ¹⁴
Records of an assessment appropriate to the size of the forest management district and intensity of management, to identify the presence of high conservation values.	<ul style="list-style-type: none"> - Rapid ecological assessment - Environmental or social impact assessment - Wildlife census - Natural heritage data - Mapping of special sites
Evidence of consultation with stakeholders, including NGOs and parties that are involved with or have an interest in the forest area, in relation to identifying HCVs and threats to them, with respect to social or environmental aspects. Where relevant, the assessment shall include consultation with representatives and members of communities and Aboriginal peoples living in or adjacent to the forest management district.	<ul style="list-style-type: none"> - Minutes of meetings - Letters of invitation - Photographs - Documentation of public participation carried out in accordance with provincial or other certification requirements

¹⁴ The sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

<p>A list of the high conservation values thus identified in the forest management district, together with evidence indicating that these high conservation values are not threatened in the forest management districts.</p>	<ul style="list-style-type: none"> - Values, Indicators, Objectives and Targets compiled to support CSA SFM Critical Element 1.4 pertaining to Sites of Special Biological Significance - Evidence of compliance with Objective Six of the SFI standard, pertaining to identifying and appropriately managing lands that are ecologically, ecologically, historically or culturally important
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Please note that the above requirements differ significantly from the requirements for HCVF assessment and conservation in forest management districts seeking full certification to FSC National Standards. Refer to the requirements for Principle Nine for the relevant FSC Canada standard (Maritimes, Great Lakes/St. Lawrence, Boreal, B.C.).

If there is specific evidence that wood that has been designated as “low risk” is in fact being harvested in violation of the requirements in Annex 3 of FSC-STD-40-005, then this evidence can be provided to any manufacturer who will take investigative and corrective action in accordance with the complaints mechanism outlined in Section 14 of the standard.

Category 4: Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses

This category considers only the conversion of natural forests to plantations or non-forest uses. It does not consider the conversion of plantations to non-forest uses, or the conversion of natural forests to semi-natural forests.

Although some managers in Canada refer to all planted forests as plantations, the FSC definition of “plantation” is considerably narrower, and is defined as “forest areas lacking most of the principal characteristics and key elements of native ecosystems as defined by FSC-approved national and regional standards of forest management, which result from the human activities of planting, sowing or intensive agriculture treatments.” Interpretations of this definition applied in FSC standards in Canada provide lists of key characteristics, and also make some reference to the manager’s *intent*; generally that the sites are not managed to provide for amenities other than timber. These definitions imply that managed secondary forests (sometimes referred to as “semi-natural” forests) are not considered plantations, even though they may be lacking *some* of the listed characteristics.

The district of origin may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicators are both present:

	Sources of information ¹⁵	Comments
There is no net loss of forest cover.	The United Nations Food and Agricultural Organization’s 2007 Report on the State of the World’s Forests includes reported information on net changes to forest cover in Canada (pg. 57). The report is available at www.fao.org/forestry/site/sofo/en/	Extent and change of forest area in Canada is reported as unchanged between 1990 and 2005.
There is no significant rate of loss (>0.5% per year) of natural forests and other natural wooded ecosystems in the eco-region in question.	One recent estimate of total area deforested annually in Canada (from forestry, agriculture, mining, oil & gas, hydroelectric developments, recreation, transportation and urban developments) is in Donald C.E. Robinson, Werner Kurz and Christine Pinkam, <i>Estimating Carbon Losses from Deforestation in Canada</i> , ESSA Technologies Ltd., March 31, 1999, Prepared for the National Climate Change Secretariat, Forest Sector and Sinks Tables, Table 5.1	Total annual deforestation in Canada is estimated as ranging between 54,600 and 80,500 hectares annually. Based on a total national forest area of 418 million hectares, this amounts to an annual deforestation rate as high as 0.019%, or 1/25 th of the international threshold. Deforestation rates in Canada are not broken down by ecoregion. It is not known if the deforestation rates in any ecoregion might potentially be more than 25 times higher than the average national rate; if so it would be restricted to ecoregions in highly urbanized areas.

¹⁵ The sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.

If there is specific evidence that wood that has been designated as “low risk” is in fact being harvested in violation of the requirements in Annex 3 of FSC-STD-40-005, then this evidence can be provided to any manufacturer who will take investigative and corrective action in accordance with the complaints mechanism outlined in Section 14 of the standard.

Category 5: Wood from forests in which genetically modified trees are planted

The district of origin may be considered low risk in relation to wood from genetically modified trees if *any one* of the three conditions below applies.

	Relevant information ¹⁶	Comments
a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned	Confined field trials of Plants with Novel Traits are listed by the Canadian Food Inspection Agency at www.inspection.gc.ca/english/plaveg/bio/st/st_06e.shtml	In 2006 there was one confined field trial of White Spruce and two field trials of poplar, both taking place in Québec in 2006. These were confined field trials, and not for commercial use.
b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use	Information needed – have any GM tree licenses been given?	
c) It is forbidden to use genetically modified trees commercially in the country concerned		

If there is specific evidence that wood that has been designated as “low risk” is in fact being harvested in violation of the requirements in Annex 3 of FSC-STD-40-005, then this evidence can be provided to any manufacturer who will take investigative and corrective action in accordance with the complaints mechanism outlined in Section 14 of the standard.

¹⁶ The sources of information are only included as examples. The content of these sources has not been assessed by FSC and companies also should feel free to use other sources of information.