

**Request for Investigation / Complaint of Program Non-Conformance (Inconsistent Practices) for Sustainable Forestry Initiative (SFI) and International Standards Association (ISO) 14001 with regard to International Forest Products (Interfor) Coastal Woodlands Operations**

*Submitted by:*

Sunshine Coast Conservation Association  
(SCCA)

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*Submitted to:*

International Forest Products  
KPMG Performance Registrar Inc.  
American Forest and Paper Association

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## **List of Acronyms**

**EMS** Environmental Management System

**FPB** Forest Practices Board

**Interfor** International Forest Products

**ISO** International Standards Organization

**MAMU** Marbled Murrelet

**MELP** Ministry of Environment, Lands and Parks

**MOF** Ministry of Forests

**SCCA** Sunshine Coast Conservation Association

**SCFD** Sunshine Coast Forest District

**SFI** Sustainable Forestry Initiative

**UWR** Ungulate Winter Range

## **Part One: Overview**

### **Purpose of Complaint**

The purpose of our complaint is to remedy a situation where logging and logging approvals in critical wildlife habitat is ongoing in the areas of International Forest Products' (Interfor) operations in the Sunshine Coast Forest District (SCFD). We have availed ourselves of the certification complaint process after having exhausted every other option available to us, as the chronology and documentation show.

### **Resolution Requested**

We respectfully request an investigation with particular regard to the context of inconsistent practices, the enormity of the infractions and the severe consequences to wildlife populations in the region if Interfor's operations continue to be non-compliant.

Our society's goal is the protection of critical habitat in the SCFD. We believe that, if fulfilled, many of Interfor's obligations under their Environmental Management System (EMS) would also support this purpose. However, the chain of events documented in this complaint indicates that there are extremely serious issues of non-compliance involving this company's EMS. We request that the company resolve the inconsistencies in their system *and* remedy the damage and potential damage to critical wildlife habitat in the area of their operations.

## **Part Two: Areas of Non-Compliance with the ISO 14001 Environmental Management System**

### **Interfor's Environmental Policy**

The following environmental policy can be found on Interfor's website:

- We will minimize environmental impact, prevent pollution and strive for continuous improvement of our environmental performance.
- We will operate in compliance with all applicable laws pertaining to the environment.
- We will regularly review our practices and procedures to monitor and report on environmental performance.
- We will provide training for employees and contractors in environmentally responsible work practices.
- We will manage our forest resources in a sustainable manner that is environmentally appropriate, socially beneficial and economically viable.

## Discussion

International Forest Products Woodlands Operations are inconsistent with the above five environmental policy statements. Throughout this complaint we will refer to specific instances, which illustrate this non-compliance with the requirements of their EMS. For clarity of presentation, we address the ISO requirements following an examination of the chronology of events.

### Chronology of Events

1998 – The Ministry of Forests informs Interfor of areas of old growth deficit, tabled by biogeoclimatic (BEC) subzone and Landscape Unit (LU), in the areas of their operations in the SCFD. This letter specifies the required targets of old growth retention from the Biodiversity Guidebook, of the Forest Practices Code (FPC). (*Document #1*)

1998 – Interfor receives comments in a review by MELP of their 1999 FDP. (*D-2*)

1999 – Interfor jointly funds and produces, with MELP, a map of marbled murrelet (MAMU) habitat in the SCFD. The map shows that only 8.6% of original murrelet habitat remains in the SCFD, well below the federal MAMU Recovery Team's recommendation of 10-12%, which is contained in the Identified Wildlife Management Strategy (IWMS) of the FPC. (*D-3*)

February, 2000 – Interfor is informed of conflicts with proposed and approved blocks in three Forest Development Plans (FDP) of FL. A19220 (2000-2004) in areas of old growth deficit, marbled murrelet habitat and ungulate winter range, by the Ministry of Environment, Lands and Parks (MELP). (*D-4*)

March 2000 – Interfor is provided a copy of a complaint to the Forest Practices Board regarding 121 cutblocks in critical wildlife habitat, filed by the Sunshine Coast Conservation Association (SCCA). (*D-5*)

January, 2001- Interfor proposes a cutblock in 2 lots that are candidate areas for addition to an ecological reserve. Interfor employee Jeff Pollock, RPF is given all relevant documentation regarding this proposal and the importance of the lots to the hydrological integrity of the reserve. (*D-6*)

February 2001 – Interfor is provided a copy of a public summary report, as a result of their SFI verification audit, which states that significant non-conformance was identified in the company's planning processes for landscape level biodiversity and wildlife habitat. These findings recognize a lack of old growth objectives, inappropriate indicators, undetermined targets, and the lack of a comprehensive program to identify and address landscape level wildlife habitat values. (*D-7*)

May 2001 – Interfor receives a letter from the Species Survival Network requesting that blocks proposed in MAMU habitat be removed from the FDP before submission due to the risk of extirpation from loss of habitat. (*D-8*)

May 2001 – Interfor sends a letter in reply saying they agree that the species may be extirpated but they're not going to change their plan. (D-9)

Fall 2001 – Interfor is provided a copy of the FPB submission to an administrative review panel hearing regarding its block N-1 in the Brittain Landscape Unit. (D-10)

December 2001 - Cutblock approval is overturned because the FDP was not in compliance with Section 10 of the FPC. (D-11)

2002 – Interfor attempts to appeal review panel decision to quash an approval in MAMU habitat. Request is denied. (D-12)

2002 – Interfor requests another district manager (from the Squamish FD) to re-approve the block that was overturned as a result of the review panel decision. The new decision-maker recognizes that there is still no plan as per *Section 10 of the FPC Act* and does not re-approve the block as it is within scarce MAMU nesting habitat. (D-13)

Summer, 2002 – FPB publishes results of complaint findings after two years of investigation. Findings state that the district manager should have grand parented UWR and that three Interfor FDPs and 16 cut blocks were inappropriately approved. With reference to these cut blocks, the FPB recommends new legislation to allow category A approvals in Ungulate Winter Ranges to be overturned. (D-14)

November 2002 – Interfor re-certified to ISO environmental standards for all its coastal woodlands operations, news release. (D-15)

December 2002 – WLAP releases new report of MAMU habitat conflicts in the Brittain LU and submits it to statutory decision-makers. It lists 6 Interfor blocks in conflict with MAMU WHAs. (D-16)

January 2003 – FPB releases special report on MAMU conservation planning. States that a severe and sudden loss of MAMU nesting habitat has occurred and extirpation may occur if interim measures are not implemented quickly. (D-17)

February 2003 – SCCA updates block status in critical habitat from the FPB complaint of 2000. Of the original 121 blocks, 21% had been logged, and 5% had been dropped. The rest (74%) are still planned for logging. During an amendment review, Interfor employee (J. Pollock, RPF) states that there are neither interim measures nor a plan in place to protect wildlife. Interfor employee refers SCCA to the text of the FDP which states that there are no measures that will be taken to protect identified wildlife or UWR until such time as the government legally designates the habitat as WHAs or as UWR under Section 69 of the FPC Act. (D-18)

March 2003 – SCCA updates Interfor's current FDP with new inventory of MAMU habitat in the Jervis LU. Overlay shows that the number of cutblocks in this LU has increased from 30 in the year 2000 to 46 blocks by the year 2003. The SCCA is extremely concerned that if logged as

planned, this activity will most likely extirpate the species in the Jervis LU. The FDP conflicts with the target for habitat retention set by the MAMU Recovery Team. (D-19)

March 2003 – Interfor changes cutblock in Ambrose Lake Ecological Reserve watershed to Category I and requests compensation from the government for doing so. (D-20)

### **Implications of the Chronology of Events to ISO 14001 Management System Compliance**

Although the SCCA does not have access to the details of Interfor's EMS, we believe that the above chronology clearly indicates that, in the area of landscape level biodiversity and wildlife management, either its system does not actually exist or does not function properly in its operations in the SCFD. We do know that Interfor has identified wildlife management as a significant area of environmental impact to be managed under their EMS. We believe this is appropriate.<sup>1</sup>

We are not able to ascertain whether Interfor currently has measurable objectives and targets in this area, as required by ISO. We request that this be investigated.

If the company *does* have objectives and targets for landscape level biodiversity and wildlife management, we request that the inconsistency of having objectives and targets on paper but no objectives and targets in place for employees doing the operational planning and harvesting be remedied.

We note that the verification audit public summary report by KPMG of February 2001 required that the non-conformance regarding appropriate objectives and targets for landscape level biodiversity be remedied and yet two years later, the chronology of events and documentation show that, during this time:

1. Interfor has continued to propose logging in critical wildlife habitat that has been identified at the landscape level;
2. Existing planned and approved cutblocks in critical wildlife habitat have not been deleted from plans.
3. Interfor was informed by the Forest Practices Administrative Review Panel that they broke the law regarding preparation of their FDP by not including measures to protect the MAMU, and that they were substantively incorrect in their interpretation of law and policy, to the point of negating the intent of that law and policy. Despite this finding, they still did not incorporate the information into their EMS. They attempted to appeal the ruling and also sought to have the block re-approved instead of fixing the plan.
4. Interfor was informed by the FPB that the approval of 16 cut blocks in UWR in the North and South Jervis FDPs was inappropriate and that measures specified in the plans for resolving issues

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<sup>1</sup> Bebb, Dave, KPMG, February 2003, e-mail.

with the Wildlife Branch were not satisfactory. Interfor seems to have made no attempt to incorporate the FPB findings into their EMS or to respond to them in an appropriate way.

5. Interfor employees, according to Jeff Pollock, RPF, February 2003, were not aware of any company plan or any interim measures to manage or protect wildlife in their planning or operations.

We believe that the above circumstances are inconsistent with the requirements of the ISO 14001 EMS in the following ways:

#### **4.3.3 Objectives and Targets:**

‘The organization is required to establish and maintain documented environmental objectives and targets that are consistent with the environmental policy.’

In the company’s environmental policy, they say that they will ‘minimize environmental impact.’ Since their objectives and targets must be consistent with this policy, in the area of landscape level biodiversity and wildlife management, Interfor must have measurable objectives and targets for minimizing impacts. At the very least, Interfor’s objectives and targets should be set at a level that would prevent knowingly extirpating species and would maintain minimum levels of critical wildlife habitat in the area of their operations, as established by the best available scientific information. (BASI)

The MoF and MELP gave Interfor this information for their areas in 1998, 1999 and 2000. These minimums should be reflected in the objectives and targets required by ISO 14001. If they were not, and still are not, we would like an investigation as to why and appropriate remedial action undertaken.

We are aware that there may be an interpretation of the ISO requirement for measurable objectives and targets where, strictly speaking, an unreasonable number that is biologically inadequate could be chosen. We agree with the wording of the auditor’s report of 2001 identifying ‘inappropriate indicators’ and ‘absence of any detailed ecological rationale’. We hope that the bar for objectives and targets will continue to be assessed in this logical manner.

However, even if Interfor has or did have at any time up to February 11, 2003 any measurable goals, targets or indicators on paper, and, even if these were established at a biologically adequate level, we maintain the company is still in noncompliance. During an SCCA visit to Interfor’s Sechelt office in February 2003, Jeff Pollock, RPF, in the company of four other Interfor RPFs, stated that Interfor has no management plan for wildlife. This was confirmed in the text of the current FDPs, which contained no interim measures to protect critical habitat. In fact there was an *increase* in the number of blocks in critical wildlife habitat.

This is inconsistent with the requirements of ISO 14001 in two areas of Implementation and Operation:



## **4.4 Implementation and Operation:**

### **4.4.2 Training, Awareness and Competence**

‘All personnel whose work may potentially affect the environment must receive appropriate training to ensure that they are competent...In addition, all staff concerned with environmental matters must also be aware of ... 1) the actual or potential impact of their work activities...2) the potential consequences of departing from specified operating procedures.’

If Interfor did or does have goals, objectives or indicators in this area, development foresters were not aware of them. This shows that either they did not have the required training or they had forgotten it. This is inconsistent with the requirements of section 4.4.2.

### **4.4.6 Operational Control**

‘Operational procedures must be established to prevent deviations from the environmental policy and its associated objectives and targets. In other words, one cannot have operational procedures that contradict the essence of the environmental policy and objective.’

Interfor’s development and engineering foresters in the SCFD have deviated from environmental policy and its associated objectives and targets which were intended to minimize impacts on landscape level biodiversity and critical wildlife habitat.

In addition, Interfor’s environmental policy states ‘We will provide training for employees and contractors in environmentally responsible work practices.’ Having development and engineering foresters who did not know of the existence of a plan or any measures, goals or objectives for wildlife habitat means that Interfor’s operations are inconsistent with this section of their environmental policy. Furthermore, the text of the FDP and the continued presence and increase of blocks in critical wildlife habitat confirms this.

In the case that the company maintains that it is just one or a few employees in one section of their operations that are unaware, untrained and operationally inconsistent on the ground and in planning, we ask for further examination.

Interfor employees are in substantial non-compliance with the ISO requirements, not merely with regard to a specific or isolated instance. The chronology of events and documentation provided with this complaint demonstrate that the non-conformance was consistent and persistent over time. The lack of goals and targets in the area of landscape level biodiversity has existed for at least 4 years.<sup>2</sup>

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<sup>2</sup> We would like to note that there are two exceptions to this overall trend. In a 2001 FDP, Al Blattler of the Interfor Sechelt operations did overlay MAMU habitat and did rationalize block placement accordingly. Although changes were not biologically adequate, it shows an attempt on the part of Mr. Blattler and we do acknowledge this as a step in the right direction. Also, a goshawk WHA has been proposed. Unfortunately, although these efforts have value, they do not mitigate the overall large-scale habitat loss that is planned and occurring.

1. Interfor personnel were given numerous letters, reports, maps, reviews, complaints, a quasi-judicial review finding, and the text of a re-determination by a district manager. Other resource professionals from MELP and MOF, the public (including the SCCA and its member groups) and the Forest Practices Board, provided Interfor with specific and measurable information on their impacts on landscape level biodiversity and critical wildlife habitat. This information was not incorporated into their planning and harvesting operations.

2. Over the noted time span, the number of cutblocks planned for harvest in these areas has increased.

This continual and increasing non-compliance illustrates the lack of an effective (or any) feedback system within the company wherein non-conformance with the EMS can be identified and remedied as stated in the company's environmental policy:

'We will strive for continuous improvement in our environmental performance.'

'We will regularly review our practices and procedures to monitor and report on environmental performance.'

We believe that this was not done or it was not done properly.

We also note that it is not only the company's policy, but also the ISO requirements that state that checking, corrective action, monitoring and measurement take place regularly.

#### **4.5 Checking and Corrective Action:**

##### **4.5.1, Monitoring and Measurement**

'In order to track the performance of objectives and targets set in the environmental policy, the organization must establish and maintain a procedure to monitor, measure and record, on a regular basis, the key characteristics of its operations and activities that have a significant effect on the environment.... In addition, procedural means to evaluate compliance with relevant environmental legislation and regulations must also be established.'

We maintain that, in general, Interfor has not been monitoring, measuring and recording its effect on critical wildlife habitat. We request that as well as generally, Interfor's procedures and documentation be investigated for two specific cases of non-conformance with law and regulation:

1. Marbled Murrelet Habitat: the administrative review panel finding of December 2001;

2. Ungulate Winter Range: the Forest Practices Board Report of 2002.

Marbled Murrelet Habitat: The administrative review panel decision of December 2001 clearly stated that Interfor was misinterpreting Section 10 of the FPC and the intent of the IWMS, which was to protect adequate habitat for the species to survive. The Federal MAMU Recovery Team recommendation of 10-12% of original habitat had been identified in the IWMS manual and on a

spatial map. While Interfor argued that they had no obligation to provide any measures in their FDP until such time as the government legally established WHAs, the review panel disagreed.

If the company had an EMS that was functioning properly, this information would have been incorporated into operational planning, and employees would have been informed of the proper regulatory requirements. If this had been the case, a great deal of time and expense on the part of our organization, Interfor and the government could have been saved.

Instead, the opposite occurred. Representatives of Interfor attempted to appeal the review panel decision. When they learned they could not appeal it, they asked for a re-determination by another district manager. This action was inconsistent with the information that had been revealed through the administrative review procedure, not only the legal decision but the scientific information as well. The new decision maker's investigation again confirmed that the cutblock in question was high quality habitat, and that there was less than 10% original habitat left in this LU. Although Interfor had the legal right to request the re-determination, it was inconsistent with its own environmental policy of minimizing impact and continuous improvement.

The results of the re-determination were, *again*, that the district manager did not approve the cutblock because it was in critical MAMU habitat. The plan was in contravention of Section 10 and the test of Section 41(1) b could not be met.

Furthermore, this case illustrates that Interfor has been given a lot of 'help' to 'monitor, measure and record impacts to the environment' and even so, Interfor has refused to incorporate this information and continues to plan and log in areas of known critical MAMU habitat. Monitoring, measurement, checking and corrective action did not occur, as it should have.

Ungulate Winter Range (UWR): In the case of UWR, Interfor employees took advantage of a mistake by an acting district manager who had refused to grandparent previously recognized UWR thus denying renewed legal status. Although the designated environment official requested that 16 blocks be removed from the plan in February 2000, they were not. They were not removed when a complaint to the FPB was made, and they were not removed when the FPB subsequently ruled that they had been inappropriately approved.

The result of Interfor's refusal to monitor, measure and undertake corrective action is serious.

All ungulate winter range is critical to the survival of populations in severe winters.<sup>3</sup> Populations of ungulates have been known to lose up to half of their numbers in such winters. The coastal mountain goat population in this region is small to begin with.

We submit that, between 1999 and 2003 Interfor did not monitor and measure, or undertake appropriate corrective action with regard to its operations in UWR in the SCFD. We believe that this inconsistency is an example of serious non-compliance with the requirements of ISO 14001.

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<sup>3</sup> Deal and Wilson, 2002, Mountain Goat Winter Range Inventory for the Howe Landscape Unit.

## Conclusion

We believe that Interfor has repeatedly and consistently been in substantive violation of the company's own environmental policy, and the ISO 14001 EMS requirements and operational procedures. We believe that the non-conformance is so significant and the consequences so serious, that the only appropriate remedy is to remove Interfor's ISO certification until such time as the company can demonstrate that the required procedures are established *and operational*. We also request that Interfor be required to provide evidence of operational plans that are in conformance with the objectives and targets for landscape level biodiversity and critical wildlife habitat.

We believe that this is the only way to remedy the situation because the company seems to be either ignoring or rewarding operational activity that is in direct contravention of its environmental policy. These facts and examples are not isolated cases. They represent a large-scale effort to operate without objectives and targets in the areas of landscape level biodiversity and critical wild life habitat. We believe that Interfor does not have a functional environmental management system in place to deal with these issues.

We believe that this is an important investigation because it is not only the environmental non-governmental organizations and wildlife populations that have a stake in the outcome. Resource professionals in industry and government are all grappling with how to comply with their EMS, especially in areas of critical wildlife habitat. We believe that it is very important to uphold the standards and proper implementation of the ISO 14001 EMS so that its international reputation is also upheld. It is important that companies actually in conformance are not put at a disadvantage by Interfor's actions. Interfor is using ISO certification to tell the marketplace that they are environmentally responsible, yet what they say they do and what actually occurs are not the same. Consumers are entitled to truthful information, and this is one of the important roles that ISO 14001 certification fills.

We respectfully understand, however, that we may not pre-determine the investigation results and we look forward to a thorough investigation of the documentation and the auditor's report.

Our sincere hope is that the system will become functional and wildlife populations and biodiversity in our region will be protected as a result of this investigation.

Thank you for the opportunity to submit this complaint and request for investigation.

## Part Three: Implications of the Chronology of Events to the SFI Program Compliance

### Overview

International Forest Products Woodlands Operations are inconsistent with the following principles, performance measures and core indicators of the Sustainable Forestry Initiative Program Standards. We have listed the requirements with a brief discussion of the particular instances of non-compliance.

We are requesting an investigation of this non-compliance, as well as remedial action on the part of Interfor to ensure future compliance and protection of critical habitat in their logging plans and operations.

### 3.5 (Principle of Sustainable Forestry) Legal Compliance

*'To comply with applicable federal, state or local forestry and related environmental laws and regulations'*

We request that KPMG investigate the question as to whether or not Interfor is in legal compliance, according to the specific requirements of SFI. We believe that the previous chronology and documentation show that Interfor is not in compliance with Section 10 of the Forest Practices Code of British Columbia, nor 'available regulatory action information'<sup>4</sup> nor the 'best scientific information'<sup>5</sup>

We also believe that Interfor is in contradiction of the agreement to ensure that their procurement practices strengthen efforts to thwart illegal logging activities. In fact, Interfor's 2000 FDP had 121 blocks that we believe fit the SFI definition of illegal logging<sup>6</sup>; they still have those blocks on their current plans and have logged 25 of them. They plan to log at least 3 of them in 2003. They have been and are currently logging illegally<sup>7</sup> in areas of critical wildlife habitat reserves. These areas have been identified as being minimum set-asides for MAMU, ungulates and old-growth dependent populations to survive.

We believe this concept of illegal logging is essential to our complaint. In the case of the MAMU and UWR in the SCFD, both Interfor and the SCFD district manager broke the law. Interfor did so by proposing blocks in critical wildlife habitat with no measures for protection, and the district manager did so by approving them. This has been established in legal precedent by the FPB, the administrative review panel of the FPB and the decision of another district manager.

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<sup>4</sup> Statistics or regulatory compliance data collected by a federal, state, or local government agency. (Note: Although conformance with laws is the intent, auditors are directed to look for a spirit and general record of compliance rather than isolated or unusual instances of deviation.) SFI 2002 definition 5.5.

<sup>5</sup> Available factual information (that is generally accepted by the broad scientific community), including, but not limited to, peer-reviewed scientific information obtainable from any source, including government and non-governmental sources, which has been verified by field testing to the maximum extent. SFI 2002 definition 5.7.

<sup>6</sup> Illegal logging: theft of timber or logs, cutting in parks, *reserves or other similar areas* where otherwise precluded by law. SFI 2002 definition 5.32

<sup>7</sup> according to the SFI definition 5.32

In the case where government will not implement or enforce the law, we maintain it is still the responsibility of the company to be in compliance with the law. Indeed, we believe this is an important function of the requirements of both SFI and ISO 14001 certification, if the public and marketplace are to have confidence in them.

If Interfor's EMS had been functioning properly, they would have paid attention to the comments of other resource professionals, the SCCA and the public as to the legality of their proposed FDPs. If they had incorporated and responded in an appropriate and timely manner, they would not now be in the situation of having 90 illegal cutblocks in their current FDP.

We maintain that the fact that Interfor is illegally logging in critical wildlife habitat is serious and substantive non-conformance with the requirements of their SFI certification. We note that the SFI definition of regulatory compliance asks the auditor to look for 'conformance with the law *and* a spirit and general record of compliance.' We maintain that Interfor demonstrates neither.

We ask if KPMG and SFI agree with our interpretation of this definition and the situation we apply it to. We ask that you also question how SFI will interpret and apply standards when the government will not implement or enforce its own law and policy.

**4.1.1.1.1** 'Program participants shall have policies to implement and achieve the Sustainable Forestry Standard Principles and Objectives.'

4.1.1.1.1 2 Core indicator: A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including...a review of non-timber issues...or biological diversity conservation.

Does Interfor have such a long-term analysis? We request this requirement be investigated.

4.1.1.1.1 3 Core indicator: Staff roles and responsibilities for achieving SFIS objectives are assigned and fully understood.

Are the roles and responsibilities of these objectives fully understood in the operations division? Indicators such as FDP contents and verbal communication contradict this.

4.1.1.1.1 4 Core indicator: Access to relevant laws and regulations in appropriate locations.

Are these available in a clear and understandable form?

**4.1.5.1.4** Program participants shall use harvest methods, age classes and judicious placement of harvest units to promote diversity across the forest landscape.

Is this in place for all landscape units? What are the targets?

**4.1.6.1.1** Program participants shall identify special sites and manage them in a manner appropriate for their unique features.

4.1.6.1.1.1 Core indicator: Written policy to identify, map and manage special sites.

Does this exist? If so, why was logging proposed for the Ambrose Lake Ecological Reserve addition?

4.1.6.1.1.2 Core indicator: Obtain existing natural heritage data and cooperate with those with expertise in identifying or selecting sites for protection of significant ecologic, geologic, cultural or historic qualities.

Does this exist?

4.1.6.1.1.3 Core indicator: Map and catalogue existing sites.

Has this been done?

**4.3.1.1.1** 'Program participants shall report annually to the SFI program on their compliance with the SFIS.'

4.3.1.1.1.1 Core indicator: Record keeping tracks all information needed for annual progress reports.

Does Interfor report on progress in meeting goals, objectives and indicators for critical wildlife habitat and landscape level biodiversity?

**4.4.1.1.1** 'Program Participants shall establish a management review system to examine findings and progress in implementing the SFI programs and policies to make appropriate improvements in policies, and to inform their employees of changes.'

4.4.1.1.1.1 Core indicator: A system to review commitments, policies and procedures to evaluate effectiveness.

Does Interfor have such a system? Does the documentation indicate it functions?

4.4.1.1.1.2 Core indicator: A system for collecting, reviewing and reporting information to senior management regarding progress in achieving SFI Objectives and Performance Measures.

Is there such a system? Have senior managers received reports as to Interfor's non-conformance with SFI requirements? What does the documentation show as the cause of Interfor's inability to be consistent with legal requirements and objectives and targets in the area of critical wildlife habitat and landscape level biodiversity? We request that senior management remedy this situation.

## **Conclusion**

We believe documentation shows that Interfor is in major non-conformance with the requirements of the SFI Program for the illegal logging of known critical wildlife habitat areas. This has developed and persisted over at least four years. Interfor must now undergo significant changes in operational plans and planning processes to bring itself into conformance. This would not be necessary had they responded to the requirements of SFI and ISO in a more timely manner. This situation and documentation causes us to question whether or not the programs, plans, inventories and record-keeping that SFI also requires are in existence and functional. We request an investigation and remedial action that results in Interfor's compliance with the law and objectives and targets that will ensure healthy populations of wildlife.

We request that, due to the seriousness of the non-compliance, and the significant consequences to wildlife populations of the area, both Interfor's ISO and SFI certification be removed until the situation is remedied and Interfor actually meets the terms of these certifications.

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March 2003

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