



July 14th, 2004

Dear Commission for the scientific, technical, public and independent study of public forest management in Quebec,

Below please find the Sierra Club of Canada's response to the questions in your survey that match our program and research areas. We are appreciative of the opportunity to comment on Quebec's forest policy, and hope that our input assists in the process of improving forest management in Québec.

1.1 What innovative elements are needed to establish a sustainable development vision for Québec's forests? What constraints would need to be overcome?

In order for Québec to establish a sustainable development vision for its forests, forest practices in the province need to operate within a new model; that of ecosystem-based management. Following an ecosystem-based management approach would mean several significant changes for practices in Québec, and would include:

- **ADEQUATE RETENTION LEVELS**
 - A strategy to ensure that forests are managed to retain natural historic levels of species composition and old growth and unfragmented forest distribution.
 - A strategy to restore tree species that are presently under-represented compared with historical patterns.
 - Harvesting guidelines that ensure that harvesting patterns emulate naturally occurring patterns, in frequency and retention level. This includes retaining components of forest structure such as snags, canopy trees, old growth trees and coarse woody debris.
- **A CHANGE IN THE TENURE SYSTEM**
 - Québec's volume-based tenure system poses a significant constraint to ecosystem-based management objectives. Québec should consider the development of a new tenure system that facilitates the potential for achieving the landscape level objectives identified in this letter.
- **ADEQUATE PROTECTION FOR SPECIES AT RISK**
 - Québec is home to endangered wolverine and caribou populations. Both of these species are intolerant of high levels of intrusion, have complex habitat requirements and need large areas of older forest.¹ Québec received near failing grades in two 2004 endangered species report cards that evaluated provincial policies to protect and recover species at risk².

¹ "Canadian species at risk according to degree of forest dependence," Natural Resources Canada, <http://mmsd1.mms.nrcan.gc.ca/cfs/bio/species-e.html>

² <http://www.cnf.ca/species/report04/pdf/ProvincialRC-QBe.pdf>; and <http://www.environmentaldefence.ca/reports/sara.htm>

In order to stop the decline of its endangered species, it needs to place a moratorium on logging in known caribou and wolverine habitat until recovery plans detailing action measures for the recovery of these species are implemented.

- **COMPLETION OF A NETWORK OF PROTECTED AREAS**
 - Québec has yet to achieve its goal of ensuring that 8% its representative landscapes are protected from industrial development in protected areas. The incompleteness of a network of protected areas (which, upon completion, should exceed the short-term 8% target) serves as a constraint at present to forest management operations as it decreases the certainty within which managers operate.
- **THE DEVELOPMENT OF A COMPREHENSIVE ACCESS MANAGEMENT STRATEGY**
 - In order to mitigate the harmful effect that roads have on wildlife habitat and, consequently, wildlife populations³, an access management plan needs to be developed for the province and as a part of each management plan to minimize the cumulative impacts caused by road development, and ultimately plan for a no-net-loss of forests policy, in which whenever a new road is created, and old road is decommissioned and returned to a natural state.

1. 2 What changes should be made to the current management framework to improve the harmonization of activities in our public forests, to ensure that the needs, values and aspirations of the various stakeholders are taken into consideration, and that the ecological integrity of the land is protected?

In order to address the needs of all stakeholders, integrated land-use planning processes should occur, premised upon the acceptance of an ecosystem-management-based model which prioritizes the maintenance of natural forest structure, function and composition, as, ultimately, sustainable communities and wildlife populations depend on the long-term sustainability of forest ecosystems.

Land use planning processes can create a forum for participatory decision making, thereby increasing accountability to the public. They also create opportunities to find common ground among competing interests and to minimize the impact of one forest use upon another. For example, industrial interests may be more supportive of conservation objectives and measures if at the same time they gain some benefit, such as certainty for investment, better coordination of resource uses, more streamlined approval processes and/or a healthier resource base.

1. 3 Given that wood harvesting and processing is one of the main driving forces behind Québec's economy, how can the social and economic impacts resulting from a decrease in wood allocations, to allow other uses of forests, be reduced?

³ Roads have been identified as one of the most significant factors contributing to the decline of wildlife populations. Noss, Reed. *The Ecological Effects of Roads or the Road to Destruction*, 1995. An online copy of this article is available at: <http://home.pacbell.net/mjvande/roads1.htm>

The government of Québec needs to invest in value-added industry and the diversification of forest products, including non-timber forest products.

1. 4 Considering existing regulations and standards, how could landscape, water and soil protection measures be improved?

Québec should review provincial policies to determine best practices for landscape, water and soil protection measures across Canada. The policy review should include certification standards that set thresholds for minimum requirements.

1. 5 From an operational point of view, what area of land should be the basic unit used for the integrated management of forest resources?

The Sierra Club of Canada commends the government of Québec for their initiative to align CAAFs with Cree traplines. This attention to cultural boundaries and non-timber land-use is a progressive step in determining guidelines for integrated management of forest resources.

1. 7 In a context of integrated resource management, how should roles and responsibilities be shared between the government, forest professionals and forest users?

Traditional planning processes offer limited opportunities for citizens who wish to become meaningfully involved in planning processes. A shift is needed wherein power held by government officials is to some extent devolved to those directly affected by forest management practices.

An ideal model for forest management is a co-management initiative where management and planning responsibilities are shared between government and local and/or Aboriginal communities. Community forests, in which communities fully manage forestry planning and operations, are another excellent model of an alternative tenure system. The province of British Columbia has led the way in awarding tenures to communities for local management initiatives.

2.4 Based on your own appreciation of the various uncertainties, what percentage of the maximum sustainable yield could represent the allowable annual cut and still constitute an acceptable level of risk?

The current sustainable yield calculation process does not adequately take into account the components of ecosystem-based management detailed above; namely the need for adequate retention levels, large areas of unfragmented forest to provide habitat for interior forest-dwelling species at risk, and the maintenance of naturally occurring patterns of old growth forests. The sustainable yield calculation process should factor in these retention objectives at the front end of the process, so that the volume/area to be logged is an outcome of the process; not a “net-down” of the maximum sustained yield.

2.5 What approaches should be applied and what knowledge needs to be acquired to incorporate economic, spatial and non-timber considerations into the maximum sustainable yield calculation, so that this wood potential is based on all forest-related values?

If the government of Québec is interested in broadening the approach to calculate the maximum sustainable yield of the forest, it should take into account the economic value of the ecological services provided by intact, healthy ecosystems, such as water and air purification and carbon sequestration.

2.7 How could Québec's key forest resources monitoring systems be improved?

The new National Forest Inventory will be a useful step, and the State of the Forests Report released by the government of Ontario serves as a good model for a monitoring system in which the results are subsequently made accessible to the public.

2.8 What roles and responsibilities should the various stakeholders have in the monitoring process, and how could their expertise be best used?

Stakeholders, including forest managers, conservation organizations, Aboriginal communities⁴ and academic institutions should share in the collection and compilation of data regarding forest conditions. Government should ensure that raw data (not simply interpreted results) is made available to the public.

2.9 What principal elements should be included in a strategy to restore the quality of Québec's hardwood and mixed forests?

While we recognize that determining the pre-industrial condition of the forest is not a reasonable template for Québec, as several centuries of active forest management pre-date industrial forestry, Québec does need to determine a benchmark for restoration that is based on the best available knowledge of the natural historical condition of the forest.

3.1 Can you suggest possible ways of rationalizing and integrating the various surveys, to improve the forest planning process?

The National Forest Inventory will ideally help to ensure national consistency.

3.2 Should the various processes required for forest surveys, maximum sustainable yield calculations, planning and monitoring be the responsibility of a single stakeholder or multiple stakeholders? Who should be involved, and why?

The government of Québec should oversee the calculation of the maximum sustained yield. The mechanism for calculation should be open, transparent and accountable. Planning processes should be open to all interested stakeholders and Aboriginal peoples, and the government should ensure that adequate financial resources are provided so that meaningful participation can occur. In addition, government should ensure that planning participants have access to knowledge-based resources that provide information on:

- ecoregions and degree of representation in protected areas (gap analysis) within CAAF
- natural and/or historic range of variability of key ecological processes (fire, blowdown, insect outbreaks, successional patterns, predator-prey dynamics)
- comprehensive inventories and distribution maps of natural communities and easily-surveyed species groups

⁴ Traditional Knowledge of Aboriginal Peoples should only be incorporated into data collection with permission from Aboriginal communities.

- needs, including habitat range, of individual and focal species
- areas of high conservation value (old growth forests, intact forests, wetlands, areas of cultural significance, critical wildlife habitat, including migratory corridors) within CAAF
- values for remote tourism
- existing and proposed hydro corridors
- existing and proposed roads
- levels of carbon stored in the forest and predicted effects on carbon storage of different management models
- a thorough socio-economic analysis for the planning area [see answer to 3.6]

3.3 Which elements would allow for greater flexibility in the planning process while upholding the values and goals of all stakeholders as well as protecting and developing forest assets?

In addition to the recommendations detailed above, the government of Québec should ensure adequate resources to Aboriginal and local communities to conduct occupancy studies and data collection regarding traditional territories and land use.

3.6 What criteria should be used to assess the socio-economic returns from silvicultural investments?

Need to expand socio-economic evaluation models to examine and predict the impacts of different management scenarios on levels of employment; traditional Aboriginal activities, recreational activities, tourism and recreation-based businesses, potential non-timber forest-based economies and the costs and benefits of ecological services.

3.7 What would be the best silvicultural approach to (1) maximize returns for the government, (2) enable forest management and wood processing companies to remain profitable and competitive, and (3) ensure a level of forest management that will maintain if not increase Québec's forest assets?

In response to this question, we feel that there should be a fourth criteria for a silvicultural approach: that the approach ensures that natural forest diversity is maintained over time. To this end, we commend the government of Québec for its commitment to not use pesticides, and encourage the government to choose a silvicultural approach that manages second growth forests to ensure that they maintain natural forest diversity as opposed to becoming fiber-producing tree farms.

4.2 How could we improve the current monitoring and auditing systems?

The growing trend towards the privatization of forests, complete with industry self-monitoring, has not served conservation objectives well. For example, recent findings by both government and conservation organizations illustrate that industry finds a significantly lower rate of non-compliance when auditing itself than when audited by government⁵. Auditing systems should be conducted by government or independent, third-party auditors. The auditing framework needs to fully address the ecological impacts of forestry practices upon ecosystems, monitoring, for example, the degree of

⁵ <http://www.sierraclub.ca/national/programs/biodiversity/forests/state-of-the-forests/scc-ontario-forests.pdf>

habitat degradation, retention levels and the conversion of forested areas to roads and landings.

4.3 Which accountability and reporting mechanisms would help achieve result-based management in the public forests of Québec?

Québec should upgrade forest policies to reflect ecosystem-based management objectives, educate forest managers regarding how forest management looks under an ecosystem-based model, and ensure that there is adequate enforcement mechanisms to monitor the implementation of these policies.

4.5 Would forest certification granted by an independent third party help achieve result-based management?

The Sierra Club of Canada recognizes that FSC⁶ certification has significant potential to improve forestry on the ground. Other certification systems, such as CSA and SFI, have some strong components, such as public participation mechanisms, but lack thresholds to ensure that progressive targets for ecosystem-based forest management are met. Further, the FSC standard is the only one in which certification standards are developed by a consensus process that includes representatives from four chambers: social, economic, environmental and First Nations.

4.8 Present models that would have potential for Québec's public forests, provide arguments in favour of those models and, where applicable, propose initiatives.

Ecosystem-based management model—see answer to question 1.1 for key components.

⁶ <http://www.fsccanada.org>