

Will the National Forest Strategy Make a Difference?

A Sierra Club of Canada Assessment

May 1, 2003



Introduction

The National Forest Strategy provides a valuable opportunity for Canada to articulate a national vision of progressive, ecosystem-based forest management. It is intended as a national “Road Map” to guide policy development, research initiatives and on-the-ground implementation of improved forestry practices.

This is the first time that the Sierra Club of Canada (or indeed any campaign-based environmental organization) has participated actively in the development of the National Forest Strategy. It’s not the first time that such groups have been invited, but in the past environmental organizations have for the most part been wary of the National Forest Strategy, viewing it as largely a public relations exercise of relatively little significance in actually leveraging positive changes in policies and practices affecting Canada’s forests.

The Sierra Club of Canada decided to set aside this skepticism in order to participate actively and constructively in the development of the new National Forest Strategy. We’ve contributed in a number of significant ways, including:

- participating in the independent review committee assessing what had been accomplished with the previous strategy;
- attending a regional consultation in the fall of 2002;
- convening a discussion forum of environmental organizations across Canada sharing an interest in the new Strategy;
- developing (in conjunction with a coalition of environmental organizations) a concise set of principles against which to measure the success of the new strategy;
- attending and participating in the national consultation meeting in Winnipeg in January 2003; and
- participating on the drafting committee for the new National Forest Strategy.

The report you are now holding is an assessment of how successful we have been in ensuring that the new National Forest Strategy addresses key issues of concern to environmental organizations in Canada. It is based on and adapted from principles developed by a broad coalition of environmental organizations, consisting of most of the environmental organizations that participated in the regional consultations in the fall of 2002.

The ten sections that follow roughly correspond to the principles developed by the coalition of environmental organizations. In this report we provide a brief rationale for each assessment, the relevant objectives or action items from the new National Forest Strategy, an assessment of how well the principle or issue has been addressed, and a list of suggested indicators that could be used to monitor implementation of action items and the degree of success in achieving the objective.

This report has been prepared by Rachel Plotkin and Martin von Mirbach for the Sierra Club of Canada. We are grateful for the collaboration, support and advice that we’ve received from our colleagues, including Peter Sandiford from CPAWS Yukon Chapter, Colin Campbell, the chair of the British Columbia Forest Caucus, Simon Mitchell from Falls Brook Centre, Helene Walsh from Albertans for a Wild Chinchaga, Kristin Bingeman from Manitoba Wildlands—Canadian Nature Federation and Cliff Wallace from the Alberta Wilderness Association. This report and its findings are solely the responsibility of the Sierra Club of Canada, however, and do not necessarily reflect the views of the individuals and organizations who have contributed to our work.

1. Completion of a network of representative protected areas

Logging, mining and urban sprawl have converted and fragmented forest ecosystems all across Canada and altered their composition, structure, function and ability to provide adequate habitat for wildlife. It is therefore essential to create protected areas that exclude industrial activity, represent the biological diversity of Canada's numerous natural regions, are large enough to accommodate natural disturbances and are able to support viable populations of native wildlife.

Park management should include managing forests adjacent to parks to ensure that park areas are connected and not fragmented, and that industrial use outside of park boundaries does not adversely affect the ecological integrity of parks.

Relevant commitments in the new National Forest Strategy

Objective 1: *Manage Canada's natural forest using an ecosystem-based approach that maintains forest health, structure, functions, composition and biodiversity, and includes, but is not limited to: ...c) completing a system of representative protected areas*

Action item 1.6: *Fulfill existing commitments to complete the network of representative protected areas networks in each province and territory.*

Assessment

We are pleased to see the directive for completing Canada's national protected areas network included in the Strategy. However, a similar objective was included in the two previous Strategies, complete with a timeline for completion by the year 2000, yet this commitment remains unfulfilled in most regions of the country. It would appear, therefore, that a statement in the Strategy does not necessarily mean that there is the genuine political will to achieve an actual commitment. Further political and public pressure needs to be applied to ensure that governments live up to the commitments embodied in the Strategy and take the necessary steps to complete an adequate representative network of protected areas.

Protected areas cannot be successfully managed if they are defined without consideration for the broader landscape of which they are a part. Management strategies need to be developed by all signatories to the Strategy that address land adjacent to and corridors between protected areas. The overall goal should be to maintain and/or restore the protected areas' ecological integrity and ensure that parks do not become mere shards of wilderness.

In addition, credible gap analyses need to be conducted to identify future protected areas needed to complete their protected areas networks. The gap analyses should use current inventories, an accepted methodology (such as that developed by WWF Canada), independent peer review and Traditional Ecological Knowledge where deemed appropriate by local Aboriginal Peoples.

Suggested indicators

1. Number of ecoregions having adequate representation in legally established protected areas
2. Area, percentage and representativeness of forest types in protected areas.

3. Level of industrial/commercial use inside of established protected areas
4. Area of wildlife corridors connecting protected areas
5. Forested area adjacent to parks managed under special management policy that ensures that industrial activities do not adversely affect park integrity.

2. Integrated land use planning

Wood supply shortages are becoming more common in regions of Canada that have been subjected to intense logging pressure for an extended period of time. As a result, the forest industry is looking towards Canada's remaining wilderness, such as the boreal forest, to meet its projected future demands for fiber. In order for Canada to demonstrate commitment to the responsible stewardship of this globally significant ecosystem it will be essential to develop adequate safeguards that ensure that the integrity of boreal ecosystem is maintained before any major developments are undertaken.

Integrated land use planning entails identifying candidate areas for protection and threatened/endangered or high conservation value forests, and subsequently deferring these lands from logging as park regulations/plans to maintain high conservation values are developed and implemented. Land use planning in both instances should involve extensive consultation with affected Aboriginal and local communities, with their preferences reflected in planning outcomes.

Relevant commitment in the new National Forest Strategy

Objective 1: *Manage Canada's natural forest using an ecosystem-based approach that maintains forest health, structure, functions, composition and biodiversity, and includes, but is not limited to: a) Using integrated land use planning, especially before tenure allocation.*

Assessment

The commitment in the Strategy to include integrated land use planning prior to new tenure allocation is an important and laudable commitment.

More work needs to be put into articulating some of the components of integrated land use planning, in order to establish a shared vision and base for adequate policies to effectively implement this objective. At a national level there should be a rigorous set of consistent guidelines and principles for innovative land use planning that: involves full consultation with affected parties; takes into account the diverse values of unallocated forests; conducts full cost/full benefit analysis; develops economic diversification strategies; explores land use alternatives; and develops strategies for maintaining remoteness in the managed forest.

Suggested Indicators

1. Area and percent of high conservation value forests, endangered forests and wildlife corridors identified and subsequently deferred from industrial use until land-use planning is conducted that ensures that the values for which these forests are identified are permanently maintained.
1. Area of land recommended as candidates for protected areas.

1. Degree of involvement by conservation and Aboriginal interests in, and level of satisfaction with the outcomes of, regional integrated land use planning processes.
1. Presence/absence of remote area strategies in areas subject to land use planning.

3. Guaranteeing conservation benefits from intensive forest management

There is a growing interest in Canada in the potential for intensive forestry to be used to generate wood fiber and the economic benefits from that fiber, while impacting on a relatively small area. The topic of intensive forest management has come up in a number of situations, including the following:

- Intensive Forest Management was raised from the floor at the 1998 National Forest Congress as an oversight in the 1998-2002 Strategy
- The Senate Sub-Committee on the Boreal Forest recommended in 1999 that 20% of Canada's boreal forest be devoted to intensive forest management, with another 20% set aside in protected areas and the remaining 60% managed primarily for biodiversity conservation
- Since 1999 the Canadian Council of Forest Ministers has been exploring a concept it calls "Forest 2020," which purports to enhance the conservation of Canada's forests while allowing for industrial growth, through encouraging the planting of fast-growing tree species on previously unforested lands
- The Ontario Forest Accord – agreed to in 1999 by a number of Ontario-based forestry companies and conservation organizations, acknowledges a potential role for increased fiber made available through intensive forestry to be shared between opportunities for industrial growth and increased forest protection.
- Canada's national climate change strategy allows for the possibility of using "carbon offsets" through establishing tree plantations, and Canada's ratification of the Kyoto Protocol means that such offsets could potentially be traded internationally.

The concept of intensive forestry remains a controversial one. There are concerns about the appropriateness of such a strategy, the land-use designations that would be required, the environmental impacts of plantations and the legitimacy of any carbon credits that might ensue. However, the high degree of interest in intensive forestry and the ensuing controversies suggest that this is the sort of issue that should be addressed in Canada's National Forest Strategy.

Relevant commitments in the new National Forest Strategy

Action Item 1.7: *Evaluate the full range of advantages and disadvantages of Intensive Forest Management across Canada.*

Assessment

The advantages and disadvantages of intensive forest management have been researched and discussed for many years, so the Strategy offers nothing new in this regard. The lack of leadership or vision in the Strategy is troubling, since it increases the likelihood that decisions about intensive forestry will be undertaken without due consideration of the environmental or

social impacts. In the case of Kyoto plantations there is a strong possibility that key decisions will be taken with little or no significant guidance from the forestry sector at all, and certainly without adequate safeguards to conserve biodiversity.

This is a missed opportunity. The Forest Strategy could have articulated an ambitious vision to ensure that intensive forestry is carried out with essential environmental safeguards in place, with adequate consideration of the interests of affected people and in a manner that ensures that there will be significant conservation gains arising as a direct result of any investments in intensive forestry.

Suggested Indicators

1. Area of land managed for intensive production of wood fiber
2. Area of land set aside for conservation as an outcome of the Forest 2020 initiative.
3. Ratio between the two above indicators (Based on the figures used by the Canadian Council of Forest Ministers, the ratio of #2 to #1 should be at least 10:1, since the CCFM maintains that intensive forestry can achieve growth of 20m³/ha/year, as opposed to a national average growth in natural forests of 1.7 m³/ha/yr.)
4. Presence/absence of a comprehensive mechanism for consultation with Aboriginal Peoples, ENGOs and forest-based communities in development of IFM projects, in the practices used and in the distribution of community benefits

4. Harvest level determination

Current methods of calculating the rate of cut lack sufficient emphasis on environmental protection and instead strive to maintain the flow of fiber to mills. Moreover, AAC levels are typically based on “sustained yield” estimates, while environmental or social considerations are often characterized as “constraints.” This leads insidiously to overcutting, since withdrawals for environmental considerations are compensated for elsewhere on the land base, and the “falldown effect” from converting old growth forests to second growth forests is often ignored as long as possible. The result has been artificially high rates of cut which have contributed to projected shortages of wood supply and ecosystem degradation.

The focus for determining the rate of cut should be placed upon maintaining the ecological integrity of the forest. The determination of harvest volume should be an outcome of this determination.

Relevant commitments in the new National Forest Strategy

Action item 1.3: Implement systems and decision-making that sets resource-use levels (for example, the Annual Allowable Cut) as an output of a planning process.

Assessment

This action item is a progressive step towards practicing ecosystem based management. The fulfillment of this objective requires revising current models of AAC calculation. This is an admittedly challenging task for provinces and territories, but one that is essential if

management regimes are to move away from basing cut determinations on the artificial need to meet mill demands for fiber, to basing timber extraction on ecosystem management.

It will take ongoing commitment and vigilance to ensure that the planning processes referred to in this action item are implemented and, further, that adequate steps are taken to account for ecosystem management considerations.

Suggested Indicators

1. Factors included in harvest volume calculations.
2. Regional/site variance in AAC outcomes

5. Identifying and removing environmentally perverse incentives

Governments have a number of mechanisms at their disposal that they can use to encourage industrial development. Some are direct mechanisms, such as subsidies, tax relief and other incentives. Others are less direct methods of assistance, including import duties, export restrictions, public lands stumpage or license fees that are below true market value, subsidization of services such as road building, and poor or inadequately enforced regulations.

There is always a danger that programs, policies and fiscal interventions made by governments in order to encourage industrial development might inadvertently undermine environmental objectives. This has been identified by Canada and other countries as an important issue. One of the Action Items in the current Forest Biodiversity Work Programme agreed to by the Parties to the Convention on Biological Diversity, for instance, is the need to “Eliminate or reform perverse incentives, in particular subsidies that result in favouring unsustainable use or loss of forest biological diversity.” (COP , Forest and Biodiversity Program of Work, Programme Element 2, Goal 2, Objective 1, Activity e). It would amount to a betrayal of the principles of multilateral environmental agreements if a country such as Canada were to presume that this action item is relevant only in other countries, and not at home.

Relevant commitments in the new National Forest Strategy

None.

Assessment

Given the sensitivities around, and interest in market access, (as demonstrated by the softwood lumber dispute), it is unfortunate that the National Forest Strategy makes no attempt to address economic and regulatory subsidies. To do so would be controversial, to be sure, but to simply duck these issues and hope that they go away is not particularly strategic.

A number of changes are needed if the Canadian government is to adequately reform or remove environmentally perverse incentives that adversely affect biodiversity and the economic well being of forest-dependent communities. The Sierra Club of Canada and other conservation groups have been advocating that environmental legislation (such as protection of species at risk) needs to be drafted and approved where gaps exist, and then more

effectively implemented and enforced at provincial and national levels. As well, stumpage fees need to be calculated in a transparent manner using independently verifiable measures of timber volumes and values, and regional log markets need to be instituted to ensure that timber resources receive full market value.

These are admittedly controversial proposals, and it is to be expected that they might not receive full support from the National Forest Strategy Coalition. But for the strategy to simply not engage in these issues is both a disappointment and a missed opportunity. It is a disappointment because it suggests that Canada is not committed to the same degree of transparency in sustainable development issues when trade interests are at stake, and it is a missed opportunity because it reduces the likelihood of developing truly innovative and mutually beneficial mechanisms through which the full range of Canadian interests might come to common understanding on this contentious issue.

Suggested Indicators

1. Stumpage and license fees collected per m³ and/or ha.
2. Level of enforcement of environmental policies
3. Market systems in place for selling timber.

6. Strengthening the role of Aboriginal People in forest management

Aboriginal Peoples have lived in Canada's forests for millennia and continue to make up a high percentage of people in Canada living directly in forested surroundings. Yet in the past they have had, generally speaking, little control over forest management decisions and few opportunities to equitably share the benefits of forest resources. Further, Aboriginal Peoples have had to live with the consequences of poor forest management such as environmental degradation and a loss of cultural values and traditions.

Aboriginal representatives articulated their key interests at the national consultation forum in Winnipeg in January 2003. "It is essential for government at all scales in Canada to recognize the unique historical, legal and political position of Aboriginal Peoples, and work towards developing a shared and grounded understanding of the inherent, Aboriginal title and rights, and Treaty rights as they apply to the conservation and sustainable use of forest land and resources, and implement institutional arrangements negotiated with Aboriginal Peoples that reflect a spirit of sharing responsibilities and benefits for the management, conservation and sustainable use of forest lands and resources."

Relevant Commitments in the new National Forest Strategy

Objective 3: *Accommodate Aboriginal and treaty rights in the sustainable use of the forest recognizing the historical and legal position of Aboriginal Peoples and their fundamental connection to ecosystems.*

Action Items:

3.1 Initiate processes with Aboriginal Peoples and appropriate levels of government for establishing:

- *a shared and grounded understanding of Aboriginal rights, Aboriginal title and treaty rights;*
- *the roles and responsibilities of Aboriginal Peoples, governments and forest stakeholders; and*
- *measures to fulfill governmental fiduciary responsibilities and the legal duty to consult.*

3.2 Implement institutional arrangements between Aboriginal Peoples and governments that reflect a spirit of sharing responsibilities and benefits for the management, conservation and sustainable use of forest lands and resources; and give effect to land claim settlements, treaties and formal agreements on forest resource use and management.

3.3 Incorporate traditional knowledge in managing forest lands and resources in accordance with the Convention on Biological Diversity.

3.4 Direct federal and other available funding to support Aboriginal capacity building and participation in implementing the National Forest Strategy, through measures such as a renewed and expanded First Nation Forestry Program and the development of a parallel Métis forestry program, and in supporting Aboriginal participation in related local, regional and international meetings.

3.5 Provide for access to a fair share of benefits from the use of forest lands and resources.

3.6 Provide for Aboriginal interests in the development of international trade agreements.

3.7 Review and update the status of forest inventories and management plans of Indian Reserve forests and identify resources to implement these plans.

Assessment

The National Forest Strategy has made significant progress in meeting the objectives set out by the Aboriginal Caucus as outlined in their submission from the National Forest Strategy consultation meeting in Winnipeg in January 2003.

One of the most important action steps in fulfilling the action items is for government to put forward clear jurisdictional guidelines, so that the national and provincial/territorial government bodies do not engage in the cycle of deferring Aboriginal forestry issues to each other.

Suggested Indicators

1. Level of access to and quality of traditional activities such as hunting, trapping and fishing.
2. Number of co-management initiatives or initiatives where there are formal, meaningful partnership arrangements
3. Number of Aboriginal tenures
4. Aboriginal satisfaction with consultation processes and involvement in forest management decision making.
5. Level of financial contributions directed towards Aboriginal capacity building in forest management
6. Number of land claims/treaty disputes resolved, from a 2002 benchmark.
7. Presence/absence of a mechanism for respectfully utilizing TEK
8. Presence/absence of tenure reform policy that reflects inherent, Aboriginal title and rights, treaty rights and values.

7. Equitable sharing of benefits with local and Aboriginal communities

Although over 90 percent of Canada's forests are publicly owned, the benefits derived from harvesting forest resources are often distributed inequitably. As timber is exported from forests adjacent to local communities, so are the majority of the profits derived from the timber. At the same time, there has been a long-term trend toward a reduction in local employment as industry increases its level of mechanization. Emphasis needs to be placed on community forest initiatives, value-added production, non-timber forest products and meaningful long-term employment commitments to ensure the equitable distribution of forest benefits with forest-based communities.

Relevant commitments in the new National Forest Strategy

Objective 2: *Develop legislation and policies to improve the sustainability (social, environmental and economic) of forest-based communities by: ...*

b) Improving access to resources;

c) Sharing benefits;

d) Enhancing multiple benefits; and

e) Supporting community resilience and adaptive capacity

Action Items:

2.2 Expand the area and use of community-based tenure systems and resource allocation models in remote, rural regions of Canada to increase benefits to Aboriginal Peoples and forest-based communities.

Assessment

The commitments in the new National Forest Strategy, will, if effectively implemented, provide some modest measures to help ensure that forest benefits flow more equitably to local communities. Especially significant in this regard will be the expansion of community-based tenure systems.

Suggested Indicators

1. Number and hectares of co-managed forests in provinces, or initiatives where there are formal, meaningful partnership arrangements
2. Number of community based tenures in provinces (as assessed from a benchmark of 2002)
3. Company track records of public-involvement processes
4. Level of meaningful employment provided to communities by forest company
5. Level of meaningful employment in alternative forest-based economies, such as tourism and recreation
6. Number of jobs per unit of harvested timber

8. Implementing ecosystem-based management

Management planning for logging has traditionally focused on how best to remove fiber from the forest, founded upon a “sustained yield” ideology that seeks greatest efficiency while observing various social and environmental constraints. The principles of ecosystem-based management reverse this trend, by focusing on what is left behind in a forest after logging. This entails ensuring that pre-industrial site characteristics, such as tree species composition, age class composition and distribution, distribution of patch size, water quality and soil structure are maintained or restored where logging occurs. It also means planning for remote areas within the managed forest, and planning comprehensive road strategies.

Relevant commitments in the new National Forest Strategy

Objective 1: *Manage Canada’s natural forest using an ecosystem-based approach that maintains forest health, structure, functions, composition and biodiversity*

Action item 1.1: *Develop guidelines for integrating watershed-based management and wildlife habitat conservation into forest management practices across Canada and measures for evaluating implementation.*

Assessment

It is entirely appropriate that the commitment to employ ecosystem-based management and, more specifically, to ensure the maintenance/restoration of forest structure, function, health composition and biodiversity is not only included in the Strategy but is positioned as a guiding principle.

More detail is needed, however, in order to ensure that this principle is actually translated into site-specific detail that will ensure that forest management practices actually live up to this ideal rather than simply paying lip service to it. In the absence of this detail ongoing vigilance will be required to ensure that the signatories develop policies that result in on-the-ground changes in forest management (such as increasing levels of forest retention within cutblocks to maintain forest structure).

Suggested Indicators

1. Margin of deviation of species composition and age-class from pre-industrial forest.

9. Maintaining natural carbon reservoirs in forested ecosystems

Growing concerns about global climate change have focused attention on the role of forests in sequestering and storing carbon. The Kyoto Protocol, ratified by Canada in late 2002, recognizes the potential role – both positive and negative – that forest management can have in mitigating or exacerbating climate change.

Relevant commitments in the new National Forest Strategy

Objective 1: *Manage Canada's natural forest using an ecosystem-based approach that maintains forest health, structure, functions, composition and biodiversity, and includes, but is not limited to: d) On a national basis, maintaining carbon reservoirs and managing the forest to be a net carbon sink, over the long term; e) Conserving old-growth forests and threatened forest ecosystems.*

Assessment

These objectives are valuable in that they recognize the importance of intact and old-growth forests, for the conservation of biodiversity and for their role in helping to mitigate climate change by storing relatively large volumes of carbon. There is a tendency in the forestry sector to focus on storing carbon in relatively fast-growing plantations, but this is a relatively short-term “quick fix,” with negative impacts on biodiversity and the environment. Proposed climate change mitigation strategies such as planting fast-growing “tree-farms” of specialized exotic species are objectionable because they simplify the structure of a natural forest, and they are also of dubious value as climate change mitigation measures because their lifespan is relatively short.

It is encouraging to see that the National Forest Strategy does not fall into the trap of promoting short-term carbon mitigation measures at the expense of long-term solutions to the challenge posed by climate change. The goal of maintaining reservoirs over the long term recognizes the value of existing carbon reservoirs in Canada's intact and old-growth forests. Further, this objective complements the objectives in the Strategy that address the need to conduct integrated land-use planning prior to tenure allocations, and to conserve old-growth forests and threatened forest ecosystems. Canada's intact boreal forest constitutes an enormous carbon reservoir, and it will not be possible to carry out large-scale logging in these regions and at the same time maintain the reservoirs of carbon.

Suggested Indicators

1. Forest carbon changes, by management district
2. Areas subject to deforestation, by source (forestry roads and infrastructure, oil and gas exploration and development, hydroelectricity generation, agricultural conversion, urban development, transportation, recreation)

10. Maintaining viable populations of wildlife

Eighty percent of the species considered at risk in Canada are threatened because of habitat loss. We need to ensure that populations of forest-dwelling species do not decline as a result of forest-management activities. Numerous species rely on old, intact, interior forests for their habitat; leaving a significant amount of each forest management unit in large intact core areas of old forest can help ensure the maintenance of such critical habitat. Further, forest management should ensure that the full range of habitats of species already assessed as “at risk” are protected or restored to levels that are sufficient to mitigate past and current harmful logging practices.

Relevant commitments in the new National Forest Strategy

Action item 1.1: Develop guidelines for integrating watershed-based management and wildlife habitat conservation into forest management practices across Canada and measures for evaluating implementation.

Assessment

The National Forest Strategy states that “About two thirds of all species found in Canada are in the forest or depend on forest habitat,” and repeatedly acknowledges that one of the functions of Canada’s forests is to provide habitat for wildlife. In order to meet the above action item, specific goals will need to be set for the maintenance of wildlife in addition to managing the forest for the maintenance of forest structure and age class, including strategies to: protect migratory bird residences where logging occurs; develop and use in the planning process habitat models for a diversity of species (including umbrella and keystone species); conduct pre-harvest site habitat inspections; and develop, where it does not yet exist; and implement, where it is in place, species at risk legislation.

Suggested indicators

1. Levels of wildlife habitat maintained (including intact, core, mature forest ecosystems and old-growth ecosystems), using pre-industrial forest as benchmark.
2. Wildlife population numbers and distribution over time
3. Number of species downgraded or upgraded in federal, provincial and territorial Species At Risk lists.
4. Number of known forest dependent species classified as endangered, threatened, extirpated, at risk or vulnerable, relative to total number of known forest-dependent species.
5. Number of known forest-dependent species that occupy only a small portion of their historical range.

Conclusion: Was it worth it?

This is the question that we are asked by our colleagues, interested to know if the new National Forest Strategy represents a genuine departure from previous strategies. Was our time and energy effectively used in seeking to influence this document?

There is no conclusive answer to this question, but several responses.

The first response is “Absolutely.” At every stage in the process our input and comments were well received, and given careful consideration. In the end, we were able to have a measurable impact on the Strategy, and are confident in recommending the document to our colleagues to use in their work.

A second response would be to say “There’s more still to be done.” This is undoubtedly the case, since several of the issues likely to be of critical importance for the Canadian forest

sector in the coming years have hardly been addressed at all in the strategy. These include forest certification, environmentally perverse subsidies, intensive forest management, climate change impacts and adaptation, and the on-the-ground requirements to practice ecosystem management.

A third response might be a more cautious “It’s too soon to tell.” After all, the strategy is mere words on paper, without any legal force and relying on good will and concerted energy to be effectively implemented. Without those concerted efforts the Strategy will be nothing more than an empty rhetorical exercise.

In balancing all of these considerations, the Sierra Club of Canada is prepared to make the following commitments:

1. *We will associate ourselves with the National Forest Accord, thereby signaling our commitment to the National Forest Strategy and our preparedness to help implement it.*
2. *We will encourage our colleagues to refer to the Strategy and recognize its value and utility as a benchmark of cooperatively achieved commitments to improved forest management.*
3. *We will monitor and report on the extent and effectiveness with which the Strategy is implemented.*
4. *We will continue to work through other channels to address the issues that are not adequately addressed in the Strategy.*

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