

August 21, 2023

RE: Forest Management carried out by Bancroft Minden Forest Company (SA-FM/COC-003810, SFL #542585) of Bancroft Minden Forest, (51 Hastings St N, Bancroft, Ontario, K0L 1C0, Canada)

To Whom it Concerns:

Please accept this letter as submission to the 2023 FSC audit of Bancroft Minden Forest Company (BMFC). I'm submitting in my role as Ontario Campaigner for the Wilderness Committee (WC), a national charitable organization that works to expand protected and conservation areas in Canada, as well as on behalf of the Catchacoma Forest Stewardship Committee (CFSC), a citizen group that advocates for the protection of a 660 ha mature and old growth forest located on crown land within the Bancroft Minden Forest Company licensed management unit.

I and the other members of the CFSC have participated over the past three years in both the Forest Management Planning process for BMFC and in the 2021 and 2022 audits of BMFC. In the latter, we raised concerns regarding the certificate holder's compliance with meeting criteria in FSC standard 6.5, specifically that company had not developed a process or mechanism to engage with myself, the CFSC and other interested stakeholders in identifying Designated Conservation Lands to fill gaps in the Conservation Area Network. Indeed, at that time we had received no reply from the certificate holder in response to a letter sent on June 1, 2020 identifying ourselves as interested stakeholders in the achievement of standard 6.5 (Appendix 1).

As a result, the 2022 audit issued the following observation and corrective action:

Observation: "The process currently being used to address interested stakeholders regarding the identification and management of designated conservation lands may not be the best available or efficient mechanism to achieve consensus* on the identified designated conservation lands*

Corrective Action: "Now that public engagement of formulation of the FMP is finished, the company should develop an efficient mechanism to address interested stakeholders regarding the identification and management of designated conservation lands to achieve consensus*.

We expect that this action will be reviewed in the upcoming 2023 audit and submit below an update on our engagement with BMFC on this matter as well as our ongoing concerns.

Engagement Update

On March 8, 2023 the CFSC received this communication from Julie Edwards, RPF, the Communications Forester for BMFC, as part of a response to questions regarding details of the 2020/2021 logging that occurred in the Catchacoma Forest:

“We are currently in the process of developing a gap analysis on the forest for conserving biodiversity and I would like to offer this as a means of working together. This document is in its preliminary stages, however I plan to share it with your group to receive input once I have reviewed the analysis data. Upon its completion, this document will lay out our currently protected areas, different analysis tools to assess biodiversity and propose areas to include within the Conservation Area Network to bridge the gaps. At this time, if you have any spatial tools you feel would be beneficial in utilizing for this analysis we would like to hear about them.” (documentation provided upon request)

The CFSC responded on March 22, 2023 with the following:

Thanks for following up and letting us know about the gap analysis development that you are undertaking for the BMFC FMU. AFER and the Catchacoma Forest Stewardship Committee would like to be involved. In fact, almost 3 years ago, we (along with others) submitted a letter to BMFC in June 2020 identifying ourselves as interested stakeholders in BMFCs progress towards implementation of *FSC Standard Indicator 6.5, "Conservation Area Networks"*.

We are particularly interested in the parameters of the gap analysis, and in ensuring that forest stand age class is included in this analysis as we are not only interested in ensuring that eastern hemlock forests persist in the BMFC FMU, but that the remaining *old-growth* eastern hemlock forests persist and hopefully increase in area coverage, which will require adequate conservation measures. We also want to ensure that other ecological, biodiversity, conservation, education, research, etc. values are considered such as species-at-risk, carbon sequestration and storage, and wildlife connectivity.

AFER and the CFSC have continued to conduct field studies and produce reports on the old growth and other conservation/societal values in the Catchacoma Forest that we feel could be included in the analysis. I have attached a few reports for your convenience. Our reports can be found at: <https://www.peterborougholdgrowth.ca/reports-press-coverage-1>

We would like to meet with you, online or in person, to learn about the gap analysis/natural heritage evaluation process and your intentions and opportunities for consultation/input from interested stakeholders. We are available at your convenience.” (documentation available upon request)

We received the following response on June 16, 2023, nearly 3 months later:

“As we are at the beginning of the developing [sic] our Gap Analysis, I will be sure to notify you when public involvement on the document is being initiated. There will be a

letter sent to your group, as well as review materials prior to a meeting which I anticipate will be this fall.” (Documentation available upon request)

As of the time of this letter (August 21, 2023) we have received no further communication on this topic.

Ongoing Concerns

While the Wilderness Committee and the CFSC are encouraged that BMFC is addressing the criteria under 6.5 to identify and designate new conservation areas that exclude forest management activities (ie: commercial logging), we continue to have concerns about the process including:

a) Consensus Process

6.5 require the company’s engagement with Indigenous Peoples and self-identified stakeholders regarding the analysis, designation and management of new conservation areas include “a process to achieve consensus.” We therefore expect that the public involvement will go beyond a standard information session and will incorporate a thoughtful method to achieve consensus, including on the parameters of the gap analysis.

b) Timeline

The 2022 audit did not provide a timeline for BMFC to implement the corrective action to “develop an efficient mechanism to address interested stakeholders regarding the identification and management of designated conservation lands to achieve consensus”. We believe that a timeline is essential in order to avoid the possibility of potential designated conservation areas being logged before the can be identified and set-aside from forest management activities. The company has already has a year to address this corrective action, and we recommend that the auditor require a timeline to achieve 6.5 within the 2023/24 season.

c) Engagement with Other Stakeholders

The statement letter of interested stakeholders sent on June 1, 2020 included parties other than the CFSC, including the Catchacoma Cottagers Association, the North Pigeon Lake Association and the Land Between Charity. To our knowledge, none of these stakeholders have been contacted by BMFC as of yet regarding the development of the Gap Analysis to designate new conservation lands. We expect that these stakeholders will be contacted with due diligence including with sufficient time to review materials and make plans to participate in any meetings towards consensus building, along with all relevant Indigenous communities.

Thank you for your consideration of these comments in the 2023 FSC audit of BMFC. The CFSC members are available to meet to expand on these comments at your convenience.

Sincerely



Katie Krelove
Wilderness Committee
Ontario Campaigner
647-208-4026

Appendix 1

June 1, 2020

To: Svetlana Zeran
General Manager, Bancroft Minden Forest Company

RE: FSC new Forest Management Standard 6.5

As you are no doubt aware, the Forest Stewardship Council (FSC) of Canada launched a new Forest Management Standard to support certification for responsible forest management in June 2019. The new standard came into effect on January 1, 2020. We are writing to express interest in Bancroft Minden Forest Company's progress towards implementation of the standard Indicator 6.5 "Conservation Area Networks".

This indicator requires that FSC-certified organizations "identify and protect representative sample areas of native ecosystems" in an effort to fill gaps in the existing conservation area networks within their management unit. These designated conservation lands, previously known as candidate protected areas, are "to be managed through the exclusion of forest management activities in recognition of their ecological and/or cultural values". The standard further clarifies the long-term objective of designated conservation lands is to transition them to legal protected status and that the company must work from within its sphere of influence to achieve that objective.

In pursuit of the achievement of the standard, FSC requires companies to initiate a process to identify gaps in the conservation area network, including a gap analysis by one or more independent experts and a peer review. For forests managed on public land, it requires the company undertake an engagement process with Indigenous Peoples and self-identified

stakeholders regarding the analysis, designation and management of new conservation areas, including a process to achieve consensus.

In light of this standard, the individual and organizational signatories to this letter wish to identify themselves as interested stakeholders for involvement in this process within the Bancroft Minden Forest Company management unit. We are interested in the process in general, and in particular, we are interested in proposing the Catchacoma forest (block 1711) of the management unit for consideration as a designated conservation land. We believe this stand to have high conservation values including the presence of various species at risk, as well as representing a rare and declining native ecosystem with old-growth qualities. It's location as adjacent to other already protected areas could add to landscape connectivity. The forest also has cultural values. The accessible location has proved to have educational value within the community; it has been employed for learning opportunities and research by Youth Leadership for Sustainability highschool classes as well as by non-profit group Ancient Forest Exploration & Research. It is also used locally for hiking, trapping, fishing and snowmobiling.

While the FSC standard cites 10% of the management unit as a minimum goal for the size of the Conservation Area Network, it also stresses that the 10% goal should not be interpreted as a maximum or necessarily desirable level. It explicitly acknowledges that there may be instances in which a more extensive network is warranted based on factors considered in the gap analysis and other high conservation values. These efforts should also consider that the federal government has committed to increasing the amount of protected area in Canada to 30% of the landscape. Considering that the 2011 independent audit of BMFC states that “the Bancroft-Minden Forest may be home to more species-at-risk than any other forest in the province”, we feel that the Conservation Area Network within this unit may warrant a larger percentage of designated conservation lands . At the very least, a new gap analysis is required that includes High Conservation Values and High Conservation Value Areas (FSC Standards, 2019, 6.5.2). We would like to commend Bancroft Minden Forest Company on its commitment to responsible management through FSC certification, and we look forward to contributing to the process of identifying ways to add to the conservation network.

Signed,

Katie Krelove, Wilderness Committee Ontario Campaigner, katie@wildernesscommittee.org

Marie Windover, Kawartha Land Trust-Securement Committee, marielwindover@gmail.com

Mitty van der Velden, President Catchacoma Cottagers Association, mittyvan@gmail.com

Edward Spence, Catchacoma Cottagers Assoc. Lake Steward, esspence@yorku.ca

Peter Quinby, Ancient Forest Exploration & Research, pquinby@ancientforest.org

Cameron Douglas, Youth Leadership in Sustainability teacher, cameron_douglas@kprdsb.ca

Radoslaw (Radek) Odolczyk, Ecologist radoslawodolczyk@gmail.com

Warren Dunlop, President, North Pigeon Lake Association president.npla@gmail.com

Ron Waters, Catchacoma Cottager ronwaters@rogers.com

Peter Currier, Member Catchacoma Cottagers Association currierpd@gmail.com

Linda Briden, Member Catchacoma Cottagers Association bridenle1@gmail.com

Leora Berman, Founder and COO of the Land Between National Charity
info@thelandbetween.ca