

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,

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