

RECOMMENDATIONS

FSC National Forest Stewardship Standard (NFSS) of Canada

Published: 17 August 2022



**FORESTSTM
FOR ALL
FOREVER**

Title: Recommendations

Contact for comments: FSC Canada
240 Richmond Street West
Toronto (Ontario) M5V 1V6

Email : info@ca.fsc.org

Version control

Publication date: 17 August 2022

Version	Description	Date
V1.0	"Recommendations" for release	2022-08-17

All Rights Reserved FSC® International 2021 FSC®/0001 OOI

No part of this work covered by the publisher's copyright may be reproduced or copied in any form or by any means (graphic, electronic or mechanical, including photocopying, recording, recording taping, or information retrieval systems) without the written permission of the publisher.

Printed copies of this document are for reference only. Please refer to the electronic copy on the FSC website (ic.fsc.org) to ensure you are referring to the latest version.

The Forest Stewardship Council® (FSC) is an independent, not for profit, nongovernment organization established to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the true value of forests is recognized and fully incorporated into society worldwide. FSC is the leading catalyst and defining force for improved forest management and market transformation, shifting the global forest trend toward sustainable use, conservation, restoration, and respect for all.

FOREWORD - WARNING

The purpose of the “Recommendations” document is to share interim answers to questions related to the FSC National Forest Stewardship Standard of Canada (FSC-STD-CAN-01-2018). “Recommendations” are not normative. FSC Canada has submitted the “Recommendations” to FSC International for review and approval and pending this the status of “Recommendation” will become an official interpretation.

The “Recommendations” were discussed and agreed by the FSC Canada Standard Development Group, assisted by related experts, as needed.

These recommendations may be invalidated or replaced at any moment. Please verify their existence on the FSC Canada website before using them.

This document is maintained by FSC Canada.

CONTENTS

FOREWORD - WARNING	2
RECOMMENDATIONS	4

RECOMMENDATIONS

FSC Canada Interpretation #	6.4.5.b – 001_2022
Name of interpretation	Ind. 6.4.5b. related to duration of set asides, remaining areas and base date
Requirement (s)	Ind. 6.4.5b, Table 6.4.5 #4
Date	2022-06-23
<p>Question:</p> <p>When evaluating the “Required Management Strategy” #4 of Table 6.4.5 (Indicator 6.4.5b),</p> <ol style="list-style-type: none"> I. Does the statement “<i>the area remains reserved for the duration of that period</i>” mean that the 50% of undisturbed habitat to be set aside is in fact to be reserved for 50 years? II. Does the phrase “<i>in the remaining areas</i>” refer to the rest of the area in the portion of the Management Unit that is within a caribou range excluding the 50% undisturbed habitat set aside? III. Does the 30-to-50-year timeframe start at January 1st, 2018? IV. Is it possible that a disturbed area as of January 1, 2018, become “undisturbed” under the 30-50 year timeframe? 	
<p>Answer:</p> <ol style="list-style-type: none"> I. No. the 50% of the undisturbed habitat as of January 1, 2018 in the portion of the management unit that is within caribou range is set aside for at least 30 years (until 2048), and remains reserved until the <35% disturbance threshold is met and can be maintained over time. The <35% disturbance threshold shall be met at the latest by year 50 (before 2068). One intended outcome of the “required management strategies” outlined in Table 6.4.5 is to lower the % of cumulative disturbance in the portion of the Management Unit that overlaps the caribou range to a level equal to or lower than 35%. The “management strategy #4”, outlined in the table follows the same objective. The set-aside of 50% of the undisturbed habitat as prescribed by #4 is a means to reach that outcome. II. Yes, the “<i>remaining area</i>” refers to the rest of the area in the portion of the Management Unit that is within a caribou range excluding the 50% undisturbed habitat set aside. An increase in disturbance in the remaining areas may only occur when linked to a plan demonstrating that the < 35% disturbance threshold will be met before year 50 for the entirety of the portion of the management unit that is within caribou range. One intended outcome of the “required management strategies” outlined in Table 6.4.5 is to lower the % of cumulative disturbance in the portion of the Management Unit that overlaps the caribou range to a level equal to or lower than 35%. The “management strategy #4”, outlined in the table follows the same objective. The set- 	

aside of 50% of the undisturbed habitat as prescribed by #4 is a means to reach that outcome.

- III. Yes, the timeframe is fixed and starts on January 1, 2018, regardless of when the audit occurs.
- IV. Yes, it is. The terms “undisturbed habitat” and “cumulative disturbance” as used in indicator 6.4.5, are defined in the Standard Glossary. A disturbed area accounted for in the cumulative disturbance calculation can be removed from the calculation as it becomes undisturbed or restored. As described in the definition, a 40-year benchmark for considering landscapes as undisturbed can be used in the absence of an empirical basis for another benchmark. That benchmark may be variable depending on the regeneration success or other factor(s). Another method for identifying undisturbed area is the approach used by Environment, Climate Change Canada (ECCC). For anthropogenic disturbance, ECCC considers a habitat as disturbed when the disturbance is visible using Landsat at a scale of 1:50 000¹. The benchmark and method used needs to be based on best available information, and peer supported science. It should be noted that FSC Canada recognizes that this approach is not necessarily equivalent to good caribou habitat.

¹ Environment and Climate Change Canada (2016) *Range Plan Guidance for Woodland Caribou, Boreal Population*.

FSC Canada Interpretation #	6.4.5c – 001_2022
Name of interpretation	6.4.5c- What does it mean “to be consistent with”
Requirement (s)	Ind. 6.4.5c
Date	2022-06-22
<p>Question:</p> <p>While the Indicator’s first Intent Box mentions that approach 6.4.5c “<i>provides a means to implement management other than those identified by Approach 6.4.5b</i>”, the text of Indicator 6.4.5c states that the “<i>caribou conservation approach</i>” be “<u>consistent with the Range Plan Guidance for Woodland Caribou</u>” (ECCC 2016).</p> <p>Can the “<i>caribou conservation approach</i>” “<i>consistent with the Range Plan Guidance for Woodland Caribou</i>” be different of the Range Plan Guidance if it avoids the destruction of woodland caribou critical habitat?</p>	
<p>Answer:</p> <p>Yes, but the approach should also include other elements.</p> <p>The <i>Range Plan Guidance for Woodland Caribou (ECCC 2016)</i> provides general guidance on the development of range plans, as well as Environment and Climate Change Canada’s</p>	

perspective regarding the desired content of a range plan”. However, this guidance is not prescriptive; it is a suggestion.

There are three elements that are expected from a “*caribou conservation approach*” that is “*consistent with*” the ECCC Range Plan Guidance:

1. The overall outcome of the ECCC Guidance and the FSC Canada indicator on woodland caribou is to maintain and, as necessary, improve the current status of the woodland caribou population. Any range plan should demonstrate actions that aim to meet that ultimate outcome.
2. The Species At-Risk Act (SC 2002) and the Recovery Strategy focus on critical habitat protection to achieve the outcome. The ECCC Guidance does not prescribe how to protect critical habitat, but it describes range-specific activities likely to result in the destruction of critical habitat.¹ These activities include:
 - Any activity resulting in the direct loss of boreal caribou critical habitat.
 - Any activity resulting in the degradation of critical habitat leading to a reduced but not total loss of both habitat quality and availability for boreal caribou.
 - Any activity resulting in the fragmentation of habitat by human-made linear features.

The likelihood that critical habitat will be destroyed increases if one or a combination of the above activities occur and if even after mitigation techniques, any one of the following occurs:

- the ability of a range to be maintained at 65% undisturbed habitat (or the threshold determined at item #5 of Option C) is compromised;
- the ability of a range to be restored to 65% undisturbed habitat (or the threshold determined at item #5 of Option C) is compromised;
- connectivity within a range is reduced;
- predator and/or alternate prey access to undisturbed areas is increased; or
- biophysical attributes necessary for boreal caribou are removed or altered.

3. Indicator 6.4.5 Option C requirements 1 to 9 are required elements to be included in the “*caribou conservation approach*”.

¹ Environment and Climate Change Canada (2016) *Range Plan Guidance for Woodland Caribou, Boreal Population*. Section 6, p.11-12.

FSC Canada Interpretation #	6.4.5c – 002_2022
Name of interpretation	6.4.5.c #5 - Informed by experts
Requirement (s)	Ind. 6.4.5c #5
Date	2022-06-22

Question:

6.4.5c #5 allows for the incorporation of an alternative habitat disturbance threshold informed by experts to be used for managing a caribou range.

1. Do experts need to:

- be directly involved in determining the alternative habitat disturbance threshold?
 - confirm the validity of the alternative habitat disturbance threshold specific to the caribou range and local context?
2. Is the involvement of government representatives or stakeholders in the review of the forest management plan that includes the caribou conservation plan sufficient to satisfy the requirement?
 3. If the decision is to manage the range using the 65% minimum undisturbed habitat threshold identified by Environment, Climate Change Canada (ECCC) in its Action Plan for Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population in Canada: Federal actions 2018, does it still need to be informed by an expert?

Answer:

1. No, an expert does not need to be directly involved, nor does formal confirmation (validity) need to be provided by an expert as long as it can be demonstrated that the threshold was determined for the specific range and local context and was developed using best available information and peer-reviewed science.

The intent is that any alternative disturbance threshold needs to be based on information coming from or authored by expert(s) (best available information and peer-reviewed science) applicable to the specific caribou range and local context relevant to the Management Unit. It must be demonstrated that the approach fosters stewardship of caribou habitat that supports self-sustaining caribou populations. Using information coming from or authored by expert(s) and taking the collaborative process into account, The Organization must demonstrate that the approach is based on best available information and peer-reviewed science providing a clear rationale for a threshold that is lower than the 65% as identified by ECCC.

2. No, involvement in the process, by a government representative or stakeholder does not automatically qualify the person as an 'expert'. To be considered an expert, the qualifications of the person must meet the definition of "expert" as described in FSC Canada's Standard glossary. Information coming from or authored by expert(s) must be relevant to the specific caribou range and local context and based on best available information and peer-reviewed science.

The intent is that any alternative disturbance threshold needs to be based on information coming from or authored by expert(s) (best available information and peer-reviewed science) applicable to the specific caribou range and local context relevant to the Management Unit. It must be demonstrated that the approach fosters stewardship of caribou habitat that supports self-sustaining caribou populations. Using information coming from or authored by expert(s) and taking the collaborative process into account, The Organization must demonstrate that the approach is based on best available information and peer-reviewed science providing a clear rationale for a threshold that is lower than the 65% as identified by ECCC

3. No. If the range is managed using the 65% undisturbed habitat threshold as identified by ECCC, it is considered that this is consistent with the Federal Range Plan Guidance and has the support of peer-reviewed science.

FSC Canada Interpretation #	6.4.5c – 003_2022
Name of interpretation	6.4.5.c #1 & #9 - Assessment and Monitoring
Requirement (s)	Ind. 6.4.5c #1 and #9
Date	2022-06-22
<p>Question:</p> <p>FSC Canada indicator 6.4.5c #1 and #9 requires “<i>An assessment of the status of population in the Management Unit</i>” and “<i>Monitoring of habitat condition and population response</i>”. In most cases, the government is responsible for assessing caribou populations on public lands and this is usually done at the range level.</p> <ol style="list-style-type: none"> 1. If government-led caribou population assessment and monitoring programs are in place at the range level, is an assessment of the status of population (requirement #1) and monitoring of habitat condition and population response (requirement #9) needed at the Forest Management Unit level, in addition to the assessment at the range level? 2. If there is no government assessment of the population (requirement #1) and/or a monitoring program (requirement #9) or if the available data is outdated, is the Organization responsible to complete an assessment and conduct monitoring? 	
<p>Answer:</p> <ol style="list-style-type: none"> 1. No, when a government-led caribou population assessment (#1) and monitoring program(s) (#9) are in place at the range level, an additional assessment is not necessary for the portion of the range that is within the Forest Management Unit. Each context should be assessed independently, as per the BAI, peer-reviewed science and direction provided through the efficient collaborative process to ensure that the status of the population in the Management Unit can be assessed with existing information. The intent is that a caribou conservation approach, including the data used to assess the status of a population and to monitor the habitat condition and population response, should be informed by best available information* (BAI) (as defined in the Standard Glossary) and peer-reviewed science. In most cases the government is responsible for conducting assessments and implementing monitoring programs, but BAI may include (but is not limited to) other information sources such as Indigenous-led monitoring, traditional knowledge or Organization and/or partner-generated data. In any case, the participants in an efficient collaborative process can direct what is relevant and at what duration and scale additional data collection measures are needed. 2. Yes, if there is no government assessment of the population (#1) and/or a monitoring program (#9) or if the available data are outdated, as determined by BAI, peer-reviewed science and direction provided through an efficient collaborative process, the Organization is responsible to find partners who can provide the data or conduct its own assessment and monitoring. <p>The Preamble of the Standard is clear in its introduction: “<i>The Organization may rely on the efforts of other parties who play a role in meeting certain requirements (e.g. government entities, Indigenous Peoples and stakeholders). Where gaps in</i></p>	

performance exist, it is the responsibility of The Organization to address these gaps, within their sphere of influence”.

The intent is that a caribou conservation approach, including the data used to assess the status of a population and to monitor the habitat condition and population response, should be informed by best available information* (BAI) (as defined in the Standard Glossary) and peer-reviewed science. In most cases the government is responsible for conducting assessments and implementing monitoring programs, but BAI may include (but is not limited to) other information sources such as Indigenous-led monitoring, traditional knowledge or Organization and/or partner-generated data. In any case, the participants in an efficient collaborative process can direct what is relevant and at what duration and scale additional data collection measures are needed.

FSC Canada Interpretation #	6.4.5c – 004_2022
Name of interpretation	6.4.5c # 4 – “Self-sustaining populations” + “an efficient collaborative process
Requirement (s)	Ind. 6.4.5c
Date	2022-06-22
<p>Question:</p> <ol style="list-style-type: none"> 1. Based on ECCC guidance and best available information (BAI), does FSC consider that maintaining a disturbance threshold of 35 % will likely support a self-sustaining caribou population? 2. Can evidence of an efficient collaborative process that is progressing in good faith be sufficient to conclude conformance to 6.4.5c despite not yet having determined an alternative disturbance threshold that supports a self-sustaining caribou population? 	
<p>Proposed Answer:</p> <ol style="list-style-type: none"> 1. Yes. To support a self-sustaining caribou population implies implementation of management measures over time. One way an Organization can demonstrate self-sustaining caribou populations is through the indirect means of applying a valid disturbance threshold over time. FSC has determined that ECCC’s disturbance threshold of 35% should be applied in the case that an alternative valid threshold has not been determined. 2. Yes, it can if the efficient collaborative process includes active progression (measurable plan and timeline) for determining an alternative disturbance threshold and/or the measures that can demonstrate self-sustaining caribou population over the <i>long term</i>*. If evidence can be provided that the efficient collaborative process (as defined in the glossary) is progressing in good faith, but has not yet determined an alternative disturbance threshold, then the default disturbance threshold of 35% should be applied over the <i>long term</i>*. Elements 1 through 9 of FSC’s 6.4.5.c also need to be met to be in compliance with the indicator. 	

