

August 11, 2009

Rick Fedrizzi
President, U.S. Green Building Council
2101 L Street, NW, Suite 500
Washington, DC 20037

Thomas Mueller
President, Canadian Green Building Council
Canada Green Building Council
47 Clarence Street, Suite 202,
Ottawa, ON K1N 9K1

Dear Mr. Fedrizzi and Mr. Mueller:

At the outset, we want to thank you, your organizations and chapters for the transformational role that the LEED system has had in promoting a greener and more sustainable built environment across North America

We are writing to you with regard to the US-GBC's ongoing revisions to how LEED standards grant credits for the use of certified wood products in buildings (MR credit 7). We understand that the US-GBC has decided to move away from solely giving credit to one certification system (FSC) and is in the process of adopting a forest certification benchmark tool to evaluate the merits of multiple certification systems. While we support competition among certification systems, it is critical for the credibility of the LEED program itself that the benchmark tool clearly and differentially award credits based on measureable performance, in the forest, of a particular certification system and its standards.

With this in mind we would like to draw your attention to the attached analysis commissioned by the Ivey Foundation comparing the Forest Stewardship Council's (FSC) standards to the Sustainable Forestry Initiative (SFI) standards across almost 50 million hectares (124 million acres) of public forest land that have been certified to date in Canada. Of these, 23 forests totaling 24.3 million hectares were certified to FSC standards and 14 forests totaling 23.6 million hectares were certified under the SFI system.

Objective and quantifiable indicators for audit rigour, audit transparency and the performance bar required by the standards themselves have been analysed. Despite SFI's growing public relations efforts and claims of 'equivalence', the analysis shows that for all of the indicators used to rank rigour, the FSC system is far and away a much more rigorous standard to meet. The analysis demonstrates that SFI's system requires significant strengthening before it can be considered a legitimate tool for advancing sustainability and we therefore urge you to exclude SFI from the LEED program at this point in time.

As presented in the attached analysis, SFI's audit teams:

- Were on average almost 3 times smaller than FSC's (2 SFI auditors versus 5 on FSC teams);
- Spent five-fold less time in the field auditing the logging operations they were certifying (6 days for SFI versus 29 days for FSC) and;
- Were comprised, on average, of only 2 foresters. (In contrast, FSC's 5 member audit teams consistently were comprised of 2 foresters and at least 1 ecologist/biologist and 1 aboriginal/community consultation specialist.)

On this latter indicator alone, SFI's auditing the sustainability of a forest company's operations without using ecologists or wildlife biologists as auditors is highly questionable. Furthermore, SFI's auditors' handling of the social and community aspects of sustainable forest management without community or aboriginal consultation experts is equally questionable.

Most significantly, SFI's performance is extremely weak on what is arguably the best overall test of the credibility of the audit process and standard - how challenging the standards and audits are to pass. The average SFI audit team identified only 2 non-conformances between the forest company's operations and the SFI standard's requirements. In contrast, the average FSC audit team identified 23 non-conformances. Under SFI's and FSC's procedures, any non-conformances found by the auditors require that a corrective action request (CAR) be issued; in other words, the forest management company must make specific improvements in order to comply with the standard. These CARs are then re-audited the following year. As the analysis demonstrates, FSC certified forest operations are routinely required to alter their management in a number of significant areas in order to achieve certification, whereas SFI certified companies are typically required to change little or nothing.

In one particularly remarkable yet illustrative example¹, two SFI accredited auditors (both foresters), in only 5 days, single-handedly assessed over 12 million hectares of public forest in BC and Manitoba and did not identify a single non-conformance with the SFI standard. The auditors did not even identify a single opportunity for improvement. The audit public summary report is almost self-congratulatory over the ease with which the company was awarded its SFI certificate.

Lastly, with respect to audit transparency, the results are similarly disturbing. The average public summary report for SFI audits was only 5 pages in length, and the vast majority of them contained little substantive information on the actual audit results. In comparison, the FSC public summary reports averaged over 51 pages in length and contained detailed information about the audit

¹ <http://www.sfiprogram.org/AuditPDFs/LP%20Western%20CanadaJuly2006.pdf>

results, the stakeholders contacted, input received and the sites visited by the auditors.

In the last several years, the conservation community and a growing number of progressive forest companies have made great strides in resolving their differences over forest practices and forest protection in North America. FSC has played a major role in forging these collaborative solutions. The result is that today there are over 40 million hectares (100 million acres) of FSC certified forests in North America. LEED, as the dominant driver of demand for FSC certified lumber and solid wood products, has played a leading role in incentivizing and providing market rewards to those companies willing to meet FSC's tough but achievable standards.

In closing, in light of the compelling performance differences between SFI and FSC presented herein, we encourage the US and Canadian Green Building Councils to ensure that the LEED system to only award credits for FSC certified wood until such time as SFI has made substantive improvements to the overall rigour and credibility of its standards and their application in the forest. A failure to do so would undermine not only a key driver of both sustainable forest management and market evolution, but also one of the critical underpinnings of the credibility of the LEED standard itself.

Sincerely



Faisal Moola
David Suzuki Foundation



Alan Young
Canadian Boreal Initiative



David
Suzuki
Foundation





Richard Brooks
Greenpeace



Nicole Rycroft
Canopy



Eric Hebert-Daly
Canadian Parks and Wilderness Society



Candace Batycki
ForestEthics



Bruce Lourie
Ivey Foundation



Attachment 1: Comparison of SFI vs FSC on key audit performance indicators in Canada

Relative performance on key indicators		SFI	FSC	
Audit rigor				
<i>Average number of auditor days in field per audit</i>		6 days	29 days	
<i>Average number of auditor days in field per 100,000 hectares</i>		.7	3.4	
Diversity of Audit Team	Average size of audit team (persons)		2	5
	Average team diversity (persons)	RPF	2	2
		Biologist	0	1
		First Nations/ community specialist	0	1.
		Other	0	1
How challenging the standards are				
<i>Average number of non-conformances/certificate granted</i>		2	23	
Audit Transparency				
Average number of pages in public summary		5	51	

Attachment 2: Summary information on forests included in this analysis

Stats on forest licenses included in analysis	SFI	FSC
<i>Number of forest licenses assessed</i>	15 ^{2,3}	23 ^{4,5}
<i>Total forest area assessed</i>	23.6 million HAs	24.4 million Has
<i>Average forest license size</i>	1.6 million HAs	1 million Has

² The criteria used to select SFI certified forests and audits for inclusion in this analysis were:

- All forests that underwent a full SFI assessment for the first time using the SFI 2005-2009 standard (i.e., reassessment audits not included); and
- All forests managed by a company or entity whose total SFI certified operations in that province exceeded 400,000 hectares (roughly 1 million acres). A threshold of 400,000 hectares was chosen as it was deemed to be large enough to represent the full-range of conditions against which to test the requirements of the standards.

³ See attachment 3 for details of the SFI assessment results

⁴ The criteria used to select FSC certified forests and audits for inclusion in this analysis were:

- All forests that underwent a full FSC assessment for the first time (i.e., reassessment audits not included); and
- All forests managed by a company whose total FSC certified operations in that province exceeded 400,000 hectares (roughly 1 million acres). A threshold of 400,000 hectares was chosen as it was deemed to be large enough to represent the full-range of conditions against which to test the requirements of the standards.

⁵ See attachment 4 for details of the FSC assessment results

Attachment 3: Detailed information on SFI certified forests included in this analysis

Province	Company	Location	Size (Has)	Certifier	Audit dates	Length of field audit	Auditor # days	# Auditor days /100,000 thousand Ha	Total Non-Team	RPF	Biologist	Aboriginal / social assessor	Other	# Pages per public summary Report	Location
BC															
	Louisiana Pacific BC timber sales	BC/Manitoba	12,541,125	BVQI	Jul-05	5	10	0.04	0	2	1	0	0	1	11 http://www.sfiprogram.org/AuditPDFs/LP%20Western%20CanadaJuly2006.pdf
	BC timber sales	Skeena	2478488	KPMG	Oct-07	info not available	info not available	info not available	2	2	2	0	0	0	5 http://www.sfiprogram.org/AuditPDFs/BC%20Timber%20Sales%20Skeena%20BA%20--%20Sept.%202007.pdf
	BC timber sales	kootenay	880877	KPMG	Dec-06	available	available	available	3	2	2	0	0	0	5 http://www.sfiprogram.org/AuditPDFs/BCTS%20--%20February%202007.pdf
	BC timber sales	Caribou - Chicoltin Strait of Georgia - report not available	1225897	KPMG	Nov-07	available	available	available	6	3	3	0	0	0	6 http://www.sfiprogram.org/AuditPDFs/BC%20Timber%20Sales%20(Cariboo%20Chilcotin%20BA)%20-6%20Nov.%202007.pdf
	BC timber sales	okanagan	215700	KPMG	Feb-08	available	available	available	n/a	n/a					Not available
	BC timber sales	100 Mile House TSA	1230000	KPMG	Feb-09	available	available	available	2	1	1	0	0	0	5 http://www.sfiprogram.org/AuditPDFs/BC%20Timber%20Sales%20--%20April%202008.pdf
	West Fraser Mills ltd	Houston Forest Products Division	400000	KPMG	Nov-05	info not available	info not available	info not available	0	2	2	0	0	0	5 http://www.sfiprogram.org/AuditPDFs/BC%20Timber%20Sales%20(Kamloops)%20--%20Feb.%202009.pdf
									2	3	3	0	0	0	4 http://www.sfiprogram.org/AuditPDFs/WestFraserOct2005.pdf
QC															
	Smurfit Stone	La Tuque	403251	QMI	Jun-06	2	4	1.0	2	2	2	0	0	0	3 http://www.sfiprogram.org/AuditPDFs/Smurfit2006Quebec.pdf
Alberta															
	West Fraser Ltd.	Hinton AB		KPMG	Nov-07	not available	not available	not available	2	2	2	0	0	0	4 http://www.sfiprogram.org/AuditPDFs/West%20Fraser%20-%20November%202007.pdf
Ontario															
	Great West Timber Limited	Ontario Divison	462,715	QMI	May-07	3	6	1.3	0	2	1	1	0	0	5 http://www.sfiprogram.org/AuditPDFs/Great%20West%20Timber%20Ltd.%20-%20May%202007.pdf
	Long Lake Forest Products Inc.	Ogoki	746,484	QMI	Feb-07	4	4	0.5	0	1	1	0	0	0	6 http://www.sfiprogram.org/AuditPDFs/Long%20Lake%20Forest%20Products%20--%20February%202007.pdf

McKenzie Forest Products Inc.	Lac Seul	721,556	QMI	May-07	4	4	0.6	0	1	1	0	0	0	9	http://www.sfiprogram.org/AuditPDFs/McKenzie%20Forest%20Products%20Inc.%20-%20May%202007.pdf
New swick															
AT Limited SFI Partnership Fornebu Lumber Company	New Brunswick Woodlands	844,580	QMI	Jun-06	4	8	0.9	1	2	1	1	0	0		http://www.sfiprogram.org/AuditPDFs/ATLP%20SFI%202005-2009%20Public%20Report%202006%20-3%20final.pdf
SFI Inc	(report not available)	957,397	QMI	n/a						n/a					n/a n/a
Total		23624283													
Average		1687448.8			3.7	6.0	0.7	1.5	1.9	1.7	0.2	0.0	0.1		5.5

Attachment 4: Detailed information on FSC certified forests included in this analysis

Province	Company	Location	Size (Has)	Certifier	Audit dates	Length of field audit	# Auditor days	# Auditor days/ 100,000 Ha	# Non-conformances identified	Team size	RPF	Biologist	FNs /social assessor	Other	# Pages per public summary Report	Location
BC																
	Tembec	Cranbrook	541333	RA	Oct-05	10	40	7.4	26	4	2	1	1	1		http://www.rainforest-89 alliance.org/forestry/documents/tembeccranbrookkootenaypubsum06.pdf
	Tembec	Invermere	204944	RA	Oct-05	8	40	19.5	24	5	2	1	1	1		50 http://www.rainforest-alliance.org/forestry/documents/tembec_invermere.pdf
	Tembec	TFL 14	161210	RA	Sep-04	5	20	12.4	24	4						62 http://www.rainforest-alliance.org/forestry/documents/tembec_license.pdf
	Tembec	Chetwynd	872728	RA	Feb-08	9	36	4.1	26	4	2	1	1	1		52 http://www.rainforest-alliance.org/forestry/documents/tembecchetwyndpubsum081.pdf
Quebec																
FSC	Domtar	Val D'or	1013269	SGS	Jul-05	6	24	2.4	19	4	2	1	1	0		http://www.domtar.com/files/sustainability/Resume_public_surveillance_no2_SGS_Quali76 for_ValdOr.pdf
FSC	Tembec	Abitibi - La Sarre	1179022	RA	Dec-04	5	20	1.7	22	4	2	2	1	1		36 http://www.rainforest-alliance.org/forestry/documents/tembecclasarrefmpubsum05eng.pdf
FSC	Tembec	Abitibi - Rouyn	419430	RA	Sep-05	5	20	4.8	23	4	2	2	1	1		34 http://www.rainforest-alliance.org/forestry/documents/tembecrouynpubsum06eng2.pdf
FSC	Tembec	Temiscamingue	1097645	RA	Aug-05	5	25	2.3	26	5	2	2	2	1		44 http://www.rainforest-alliance.org/forestry/documents/tembec_gestion.pdf
FSC	Tembec	Abitibi-Est	711020	RA	Apr-08	6	24	3.4	20	4	1	1	1	1		http://www.rainforest-alliance.org/forestry/documents/tembecabitibi-40 estpubsum_08fre.pdf
Alberta																
FSC	Alpac	Alpac FMA	5780000	RA	Nov-05	12	60	1.0	24	5	2	1	2	1		29 http://www.rainforest-alliance.org/forestry/documents/alberta_pacific_fmpubsum05.pdf
Nova Scotia																
FSC	NewPage Corp	Port Hawkesbury NS	631200	RA	Jun-07	7	28	4.4	30	4	1	2	1	0		http://www.rainforest-47 alliance.org/forestry/documents/newpageporthawkesburypubsum08.pdf
Ontario																
FSC	Tembec	Smooth Rock Falls	533785	RA	Jan-04	4	20	3.7	31	5	2	1	2	0		http://www.rainforest-40 alliance.org/forestry/documents/tembecsmoothrockfallsmpubsum05.pdf
FSC	Tembec	Romeo Mallette	628,958	RA	Jan-04	4	20	3.2	32	5	2	1	2	0		75 http://www.rainforest-alliance.org/forestry/documents/tembec_romeo.pdf
FSC	Tembec	Superior Forest Gordon Cosens	738000	RA	Dec-04	5	20	2.7	33	4	2	1	1	0		38 http://www.rainforest-alliance.org/forestry/documents/tembec_superior.pdf
FSC	Tembec	Forest	2016301	RA	Jun-02	13	50	2.5		5	2	1	1	0		89 http://www.rainforest-alliance.org/forestry/documents/tembec_gordon.pdf
FSC	Domtar *	Spanish Forest	1,228,632	RA	Dec-05				16	4	1	1	1	1		34 http://www.rainforest-alliance.org/forestry/documents/domtarspanishpubsum06.pdf

FSC	Domtar **	Wabigoon, ON	729,104 QMI	Feb-08	4	15	2.1	17	5	2	1	1	1	36	http://www.fscscanada.org/docs/domtar%20dryden%20public%20fsc%20fm%20report.pdf
FSC	Clergue Forest Management Inc.	Algoma Forest Northshore Forest	951,004 RA	Oct-04	9	36	3.8	31	4	1	1	2	0	34	http://www.rainforest-alliance.org/forestry/documents/algomaforestfmpubsum05.pdf
FSC	Inc. Vermilion Forest Management Company Ltd.	Huron Northshore Lake Forest	1,117,070 RA	Oct-04	5	25	2.2	26	5	1	1	2	1	33	http://www.rainforest-alliance.org/forestry/documents/nfifmpubsum05.pdf
FSC	Westwin d Forest Stewards hip Inc.	Sudbury Forest French/Severn Forest	648,897 SCS	Oct-05	6	24	3.7	6	4	2	1	1	0	101	http://www.scscertified.com/nrc/certificates/forest_Vermilion_%20053006.pdf
FSC			421,683 SGS	Oct-01	8	32	7.6	11	4	1	1	1	1	44	http://www.forestry.sgs.com/sgs-fm-0931.pdf
Manitoba															
FSC	Tembec	Pine Falls	897446 RA	Nov-04	6	30	3.3	35	5	1	1	2	1	39	http://www.rainforest-alliance.org/forestry/documents/tembecpinefallsfmpubsum07.pdf
Saskatchewan															
FSC	Mistik Forest Management	Meadow Lake	1,831,964 KPMG		5	30	1.6	10	6	3	1	2	1	58	http://www.kpmg.ca/en/ms/forestcertification/documents/MistikFSCCertificationAuditPublicSummaryReport.pdf
Total			24354645												
Averags			1058898	29.0		4.5	23.3	4.5	1.7	1.2	1.4	0.6	51.3		