

October 21, 1999

File: 135-40/Part 10.1 - Canfor

Jim Stephenson
Manager, Corporate Forestry
Canadian Forest Products Ltd.
P.O. Box 6000
2011 Pulp Mill Road
Prince George, British Columbia
V2N 2K3

Dear Jim Stephenson:

Thank you for submitting a preliminary proposal on behalf of the piloting partners (Canfor, Louisiana-Pacific, Slocan and the SBFEP) to pilot test new methods of regulating forest practices and for participating with staff from the Ministry of Forests and Ministry of Environment, Lands and Parks in conducting an assessment of the proposal. The Joint Steering Committee (JSC) has reviewed your proposal and sees merit in you now proceeding to the next step in fully developing your piloting proposal for a portion of the Fort St. John Timber Supply Area.



I am pleased to respond with the following comments on behalf of the JSC:

- The JSC understands that the quality of forest inventory is seen as a major challenge for proper planning and suggest you pursue funding arrangements with FRBC. We are pleased to note your corporate commitment to the project with or without FRBC funding support.
- The JSC acknowledges that Treaty 8 First Nations have high expectations as a consequence of the Oil and Gas MOU and suggest that caution be exercised to ensure that there is no compromising of government's fiduciary obligation to consult with First Nations. This is a prime consideration for your proposed new framework for planning and permitting processes.
- The JSC notes that you are proposing criteria be developed on the basis of criteria and indicators approved by the Canadian Council of Forest Ministers. It is suggested that there is a significant amount of work required in the very early stages of full proposal development in making these criteria measurable and getting some common understanding and acceptance of their meaning.

- The JSC believes that your proposed quality assurance framework needs further conceptual work. The roles of agencies, licensee, first nations and public in the auditing and reporting process need clarification and acceptance. Also, there is a need to take care in developing a credible process for selecting auditor(s) and ensuring their terms of reference are broadly understood and accepted. Lastly, more work should go into identifying effective strategies for mitigation and remediation.
- Finally, we suggest that more work is needed in developing effective procedures for notification and referral to third parties, such as trappers, guides and outfitters.

The JSC suggests that your next step in fully developing your proposal should be to meet with the Regional Manger, MOF and Regional Director, MELP, or their designates, to agree to a comprehensive action plan. You should give full consideration to the above points in this plan.

The JSC appreciates having had the opportunity to review and comment on your preliminary proposal. The second step in the process calls for you to fully develop a proposal that achieves the essential purpose of meeting the legislated tests in Section 10.1 of the *Forest Practices Code Act*. Special attention will then need to be given to ensuring adequate review and support of public and agencies, and appropriate methods of information exchange with First Nations. Nothing in this letter should be construed to limit in any way that essential purpose.

The JSC offers its best wishes to you in proceeding with the continuing development of your piloting proposal.

Yours truly,

Guenter Stahl
Project Manger
Result Based Code Pilots

Pc: Regional Manger, MOF – Ray Schultz
Regional Director, MELP – Wally Eamer
District Manager, MOF – Fort St. John – Dave Lawson
Joint Steering Committee
Ralph Archibald, Director Forest Practices Branch – MOF
Rod Davis, Director Habitat Protection Branch – MELP.