

May 12, 2025

Sustainable Forestry Initiative
2121 K Street NW, Suite 750
Washington, D.C. 20037
USA

To:

Lauren Cooper, Chief Conservation Officer, SFI

Dr. Healy Hamilton, Chief Scientist, SFI

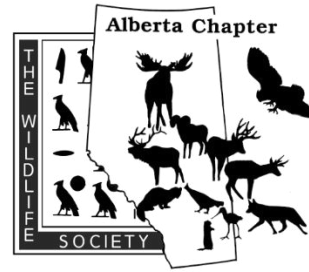
Gregor Macintosh, Senior Director, Standards

Subject: Concerns Regarding Weyerhaeuser Company Compliance with SFI 2022 Forest Standard

Dear Sustainable Forestry Initiative,

I am writing today on behalf of the Canadian Parks and Wilderness Society Northern Alberta Chapter, Nature Alberta, and the Alberta Chapter of the Wildlife Society to formally express concerns regarding Weyerhaeuser Company's compliance with the Sustainable Forestry Initiative (SFI) standards, particularly as they relate to the conservation of Southern Mountain Caribou – a *Threatened* species under Canada's *Species at Risk Act* and the province of Alberta's *Wildlife Act*.

As an organization committed to responsible forest management, SFI's standards should ensure that companies operating under its certification meet rigorous environmental and biodiversity conservation expectations. The planned timber harvest plan for SFI Certificate Holder Weyerhaeuser's managed forest (Alberta Forest Management Unit G16), as described in the Government of Alberta's draft Upper Smoky Sub-Regional Plan, would greatly challenge the persistence and eliminate recovery potential of the Redrock-Prairie Creek and Narraway caribou populations, indicating a failure to meet the 2022 SFI Forest Management Standard. CPAWS Northern Alberta, the Alberta Wilderness Association and the Alberta Chapter of the



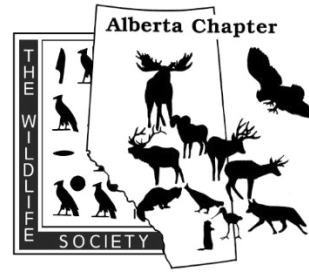
Wildlife Society authored the attached report highlighting the dire impacts of the proposed plan on southern mountain caribou conservation and recovery.

Specifically, Weyerhaeuser's proposed timber harvest plan will remove the remaining critical habitat within the winter ranges of the two caribou populations. Redrock-Prairie Creek and Narraway are two of the last three southern mountain caribou populations left on provincial lands in Alberta. Their populations and distribution have declined for decades due to habitat disturbance from timber harvesting and oil and gas developments. The Weyerhaeuser Company planned logging activities will remove critical habitats, disrupt ecological connectivity, decrease caribou survival, and undermine recovery efforts for *Threatened* caribou populations. Canada's federal government has found Southern Mountain Caribou to have imminent threats to their recovery – the Redrock-Prairie Creek and Narraway caribou populations are in urgent need of habitat conservation and recovery.

SFI's 2022 Standard and Rules require certified companies to actively identify and protect biodiversity, including species at risk and their habitats (Objective 4). The Weyerhaeuser Company timber harvesting documented in the draft Upper Smoky Sub-Regional Plan would remove all caribou critical habitat across the last remaining areas of caribou occupancy within their winter ranges. The attached report highlights the devastating impacts the proposed timber harvest will have on the Redrock-Prairie Creek and Narraway caribou populations. If approved this plan will eliminate the ability of the Redrock-Prairie Creek and Narraway caribou to exist on their traditional winter ranges and greatly increase the risk of the two populations becoming extirpated.

Weyerhaeuser's proposed timber harvest plan represents a failure to meet the SFI Objective 4 when measured against Performance Indicators 4.1, that is: *Certified Organizations shall conserve biological diversity.*, 4.2 *Certified Organizations shall protect threatened and endangered species, critically imperiled and imperiled species (Forests with Exceptional Conservation Values), and natural communities, and old-growth forests.*, and 4.3. *Certified Organizations shall manage to protect ecologically important sites in a manner that takes into account their unique qualities.*

Given these concerns, we respectfully urge SFI to undertake a formal review of Weyerhaeuser's certification status and investigate whether the company is in violation



of SFI's sustainable forest management standard. If non-compliance is confirmed, we encourage SFI to take appropriate corrective actions.

The credibility of SFI as a sustainability certification system relies on its ability to enforce its standards and ensure that certified companies are held accountable for their environmental impact.

We appreciate your attention to this matter and look forward to your response outlining any steps SFI intends to take regarding Weyerhaeuser's compliance with biodiversity conservation requirements.

We are happy to provide additional information or discuss this issue further at your convenience.

Sincerely,

Tara Russell

Program Director, CPAWS Northern Alberta

Colleen Cassady St. Clair

President, Alberta Chapter of the Wildlife Society

Cheryl Bozarth Soll

President, Nature Alberta

Attachment: Implications of the Alberta Government Draft Upper Smoky Sub-Regional Plan for Southern Mountain Caribou