



# WWF GUIDANCE FOR COMPANIES SOURCING WOOD AND FIBRE FROM CANADA

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## BACKGROUND AND CONTEXT

Forests in Canada are significant due to their importance to Indigenous Peoples and for the role they play in supporting communities, providing critical habitat for a wide range of species at risk such as woodland caribou and serving as a major carbon sink. Multiple pressures including human activities and climate change threaten forests in Canada and the many important benefits that they provide.

To address these pressures, WWF<sup>1</sup> emphasizes the need for robust policies at both government and corporate levels to conserve biodiversity and maintain forests' capacity to sequester and store carbon at levels necessary to limit global warming to 1.5°C. Companies that source forest products from Canadian forests have a responsibility to ensure that their sourcing does not contribute to the degradation of ecological and cultural values.

This user guide provides WWF's recommendations and expectations for policy commitments and best practice for companies sourcing wood and fibre from Canada. It addresses supply chain risks regarding Intact Forest Landscapes (IFLs)<sup>2</sup>, Indigenous Cultural Landscapes (ICLs)<sup>2</sup>, woodland caribou habitat, and Free Prior and Informed Consent (FPIC)<sup>2</sup> from Indigenous Peoples. Companies should use these recommendations to supplement holistic responsible wood and fibre sourcing policies aligned with the Accountability Framework<sup>3</sup>. Such policies should protect high conservation and cultural values across all forest types and ecosystems and should commit to avoiding sourcing wood and fibre from unacceptable or high-risk sources<sup>4</sup>.

This information reflects WWF's current assessment of the scientific and policy landscape. It will be updated as new information emerges, including changes in tenure, licensing, management on Crown lands and mill ownership in Canada, which could introduce additional uncertainties and challenges. WWF's overarching goal in providing this guidance is to promote the conservation and responsible stewardship of forests in Canada for the benefit of people, nature, and climate.

<sup>1</sup> Guidance developed by WWF-Canada and WWF-US

<sup>2</sup> IFLs, ICLs, and FPIC, as defined by FSC-STD-60-004

<sup>3</sup> The Accountability Framework Initiative: How to Write a Strong Ethical Supply Chain Policy: [accountability-framework.org/resources/resource-hub/how-to-write-a-strong-ethical-supply-chain-policy/](https://accountability-framework.org/resources/resource-hub/how-to-write-a-strong-ethical-supply-chain-policy/)

<sup>4</sup> As defined by FSC-STD-40-005

## POLICY EXPECTATIONS: KEY ELEMENTS

WWF urges companies sourcing from Canada to adopt wood and fibre sourcing policies that:

1. Recognize and maintain or enhance high conservation and cultural values, including but not limited to:
  - a. Primary forests<sup>5</sup>, old-growth forests<sup>6</sup> and Intact Forest Landscapes (IFLs);
  - b. High carbon stock forests;
  - c. Habitat of rare, threatened<sup>7</sup> and endangered<sup>8</sup> species such as woodland caribou;
  - d. Indigenous rights and interests related to their traditional territories.
2. Avoid forest degradation<sup>9</sup> and minimize it where avoidance is not possible.
3. Recognize and commit to the principles of the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and explicitly commit to and implement FPIC.
4. Commit to engage collaboratively with Indigenous Peoples, governments, civil society organizations, local communities and other companies to address the above issues.
5. Include time-bound targets and milestones for commitments that are in progress at the time the policy is issued.
6. Commit to report publicly on progress toward policy implementation.
7. Commit to acknowledge and respond to complaints in a timely and transparent manner via a public grievance mechanism.
8. Incorporate internal and external processes that enable achievement of these commitments, including but not limited to:
  - a. Communicating wood and fibre sourcing policy updates to suppliers;
  - b. Securing supplier cooperation and compliance.

<sup>5</sup> Although there is no universally accepted definition of primary forests, primary forests are generally understood to be natural forests that have not been impacted by human activities aside from traditional Indigenous use. WWF does not endorse any particular definition of primary forests and there is currently no available map of primary forests in Canada. WWF urges companies to adapt sourcing policies to reflect the most up-to-date information on primary forests and their distribution as it becomes available.

<sup>6</sup> Old-growth forests may be defined differently across forest types, and sourcing policies should allow for these distinctions.

<sup>7</sup> Threatened species means a wildlife species that is likely to become an endangered species if nothing is done to reverse the factors leading to its extirpation or extinction (*Species at Risk Act*, S.C. 2002, c. 29, s. 2)

<sup>8</sup> Endangered species means a wildlife species that is facing imminent extirpation or extinction (*Species at Risk Act*, S.C. 2002, c. 29, s. 2).

<sup>9</sup> The United Nations Food & Agriculture Organization is leading work to develop a definition of forest degradation, and the Government of Canada has been working to develop a definition and set of indicators for forests in Canada.

## POLICY GUIDANCE: IMPLEMENTATION

WWF urges all companies sourcing forest products from Canada to gather information, assess risk, implement mitigation measures, monitor and publicly report on performance, and drive continuous progress toward environmentally and socially responsible forestry.

### STEP 1: GATHER SOURCING INFORMATION

Companies must first develop a comprehensive understanding of their forest-related sourcing footprint. This entails establishing systems that allow traceability through the supply chain to the origin.

Key information to gather:

- Identify the forest management units (FMUs) (i.e., geographic locations) that supply roundwood to primary manufacturers in the supply chain<sup>10</sup>. In this assessment, include areas managed by Indigenous Peoples, whether independently or in partnership with non-Indigenous companies.
- Identify the tenure holders (e.g. forest licensees, private landowners). The identified tenure holders should have management responsibility for the land from which the forest product is sourced.
- Identify the total volumes of wood and fibre coming from each FMU.

### EXAMPLE: MAPPING SUPPLY CHAIN ORIGINS

“So Soft” sources pulp from two pulp mills in Ontario, Canada: **Best Fibre** and **Fibre First**. “So Soft” collected detailed sourcing information from both suppliers via a supplier survey and learned the following:

1 Best Fibre Pulp Mill Total = 50m <sup>3</sup> (roundwood) and 25 tonnes of fibre (residues and chips)	2 Fibre First Pulp Mill Total = 50m <sup>3</sup> (roundwood) and 40 tonnes of fibre (residues and chips)	3 Consolidated “So Soft” fibre origins (from both suppliers)
Fibre direct from forest (roundwood and chips)		“So Soft” pulp originates from:
<ul style="list-style-type: none"> <li>• 45 m<sup>3</sup> from <b>FMU-A</b> (managed by Best Fibre)</li> <li>• 5 m<sup>3</sup> from <b>FMU-B</b> (managed by Spruce Grove)</li> </ul>	<ul style="list-style-type: none"> <li>• 35 m<sup>3</sup> from <b>FMU-D</b> (managed by Fibre First)</li> <li>• 15 m<sup>3</sup> from private land</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Six FMUs:</b> A, B, C, D, E, F</li> <li>• <b>Six forest managers:</b> Best Fibre, Spruce Grove, Pine First Nation (via joint venture), Fibre First, Lucky Lumber, private landowner</li> <li>• <b>Two types of sources:</b> direct harvest (from FMUs or private land) and indirect harvest (from sawmill residues)</li> </ul>
Indirect fibre from sawmill residues		
<ul style="list-style-type: none"> <li>• 25 tonnes from <b>FMU-C</b> (managed by Best Fibre and Pine First Nation, joint venture)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 tonnes from <b>FMU-E</b> (managed by Lucky Lumber)</li> <li>• 35 tonnes from <b>FMU-F</b> (Managed by Lucky Lumber)</li> </ul>	

<sup>10</sup> Primary manufacturing is “[a]ny processing that transforms roundwood into materials other than roundwood. For chip and fibre products, primary manufacturing includes the pulp mill as well as the paper mill stage.” (FSC-STD-40-004). Other examples include sawmills, veneer mills, and mills that convert roundwood into chips.

## STEP 2: IDENTIFY AND ASSESS RISK

Gather further information from scientifically rigorous resources, interviews with Indigenous Peoples and other publicly available resources to evaluate:

- The risk of non-compliance with the company's sourcing policy for each FMU identified above (see above section on Policy Expectations).
- The risk of mixing wood and fibre from higher risk sources with lower risk sources within the supply chain.

This assessment of risk should address all relevant policy commitments as outlined in the **Policy expectations: Key elements** section above. Any mitigation measures (e.g., found in forest management plans, certification audit reports) that suppliers may be taking to address risks should be taken into consideration. Where insufficient information is available to assess risk, the precautionary approach should be applied, meaning that higher levels of risk should be assumed.

WWF-Canada's [Forest Tenure Risk Analysis tool](#) can be used as a first step to assess some risks related to forestry activities in FMUs across Canada.

## STEP 3: IMPLEMENT RISK MITIGATION MEASURES

Risk mitigation should be prioritized by ranking FMUs in the sourcing footprint based on the level of risk and the volume of wood or fibre procured from them. Where risk is identified, work with suppliers to develop and implement mitigation measures.

As a top priority for mitigating risks and improving forest management, work with tenure holders to pursue and obtain **Forest Stewardship Council (FSC) Forest Management (FM) certification**. Where FSC FM certification is not feasible, recommended mitigation measures include:

- Ensuring that risks are addressed through third-party verification via a “non-FSC+ mechanism.” For companies certified to the Sustainable Forestry Initiative, Canadian Standards Association, or Programme for the Endorsement of Forest Certification FM standards, this would involve:
  - Conducting a gap analysis for all identified risks against the relevant criteria and indicators from the FSC FM standard;
  - Implementing measures to address risks in accordance with the requirements of the FSC FM standard;
  - Having an auditor verify that those FSC FM standard requirements are being met.
- Requiring certification to the FSC Controlled Forest Management (FSC CFM) Standard. Under this standard, tenure holders can demonstrate that the materials produced and supplied from their FMUs conform to the five controlled forest management categories<sup>11</sup>. FSC CFM is a stepwise approach towards full FSC FM certification and a transition is required within five years.
- Meeting additional or alternative requirements developed through a credible multistakeholder process to effectively address concerns, with verification by a third party.

If the forest tenure holder does not agree to one or more of the above mitigation options, prepare a plan to phase out sourcing from them and implement it in a reasonable time frame.

<sup>11</sup> As defined by FSC-STD-30-010 Controlled Forest Management Standard

## STEP 4: MONITOR PERFORMANCE AND DISCLOSE PUBLICLY

- **Policy compliance monitoring:** Implement ongoing monitoring mechanisms to ensure supplier compliance with policies.
- **Non-compliance protocol:** Develop and release a clear protocol defining how the company will respond to supplier non-compliance, including clear, time-bound consequences for violations.
- **Targets and phase-outs:** Set and track targets for phasing out sourcing from FMUs or suppliers that are non-compliant, while prioritizing material from suppliers who are compliant or are demonstrably moving toward compliance.
- **Grievance mechanism:** Establish a robust grievance system and track resolution of grievances publicly, while recognizing confidentiality considerations. For guidance, consult best practices from the Accountability Framework Initiative (AFi)<sup>12</sup> and the International Finance Corporation – World Bank Group (IFC/WB)<sup>13</sup>.
- **Public disclosure:** Regularly disclose progress while respecting confidentiality where appropriate.

## STEP 5: CONTINUOUSLY IMPROVE

The measures recommended above are not solely intended to mitigate risk; more importantly, their implementation will play a pivotal role in improving the management of forests in Canada. Risk mitigation and responsible sourcing are continuous processes. The guidance offered in this document serves as a starting point and should be regularly reviewed and updated as new information becomes available.

<sup>12</sup> [Accountability Framework initiative](#)

<sup>13</sup> [International Finance Corporation | World Bank Group](#)





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