

January 25, 2026

**Formal Complaint Regarding CPABC Publication and Public Interest Obligations**

To: Chartered Professional Accountants of British Columbia (CPABC), Attn: Complaints /  
Regulatory Communications

Cc:

Ms. Kate Haines, Superintendent of Professional Governance,  
Honourable Jessie Sunner, Minister of Post-Secondary Education and Future Skills,  
Ms. Lori Mathison, President & Chief Executive Officer, Chartered Professional Accountants of  
British Columbia

We are writing to submit a formal complaint concerning the conduct of the Chartered Professional Accountants of British Columbia (CPABC), and specifically a publication by its President & Chief Executive Officer, Ms. Lori Mathison FCPA, entitled "Reporting on Sustainability in the Resource Sector" (CPABC Newsroom, January 2026).

<https://www.bccpa.ca/news-events/cpabc-newsroom/2026/january/reporting-on-sustainability-in-the-resource-sector/>

This complaint is made pursuant to the Chartered Professional Accountants Act (CPA Act) and CPABC's statutory obligation to protect the public interest, establish and enforce professional standards, and regulate the professional conduct of its members.

CPABC is a statutory regulator, not an industry association. Its public communications therefore carry regulatory authority and are reasonably relied upon by members of the public, policymakers, and professionals as authoritative guidance.

The article repeatedly presents Sustainable Forestry Initiative (SFI) certification as evidence supporting sustainability claims in the forest sector. In our respectful submission, this is a misleading representation of what SFI certification demonstrates and risks legitimizing sustainability claims that are not substantiated by ecological or scientific evidence.

Voluntary certification schemes such as SFI do not establish that harvesting is ecologically sustainable, that biodiversity is protected, or that forest ecosystems are maintained over time. Because SFI assesses practices primarily at the stand level and does not evaluate cumulative or landscape-scale impacts, it is not capable of demonstrating long-term ecological sustainability. Equating SFI certification branding with sustainability outcomes is precisely the type of conflation that sustainability and ESG reporting frameworks are intended to prevent.

This concern is compounded by the article's reliance on statements from a senior representative of Canfor Corporation as exemplars of sustainability practice. Canfor has experienced repeated mill closures, curtailments, and chronic fibre supply shortages across multiple operating areas.

These factors are widely reported and are commonly understood in forest policy and economics as indicators of long-term overharvesting and resource depletion, not sustainability.

The interviews published by Ms. Mathison assert that SFI certification compliance demonstrates sustainable forest management, that increased wood use mitigates climate change, and that prompt reforestation reflects ecological sustainability. In this context, these statements are incomplete and misleading. The scientific literature is clear that a replanted plantation does not replicate the structure, biodiversity, hydrological function, or resilience of a natural forest. Presenting such practices as “the real story” misrepresents fundamental ecological distinctions.

Section 3 of the CPA Act establishes that CPABC’s core objects include regulating professional conduct, establishing and enforcing professional standards, and protecting the public interest. In our view, publishing and endorsing industry narratives that conflate SFI certification with sustainability outcomes is inconsistent with these statutory obligations.

#### Additional Statutory and Governance Concerns

In addition to the concerns set out above, this publication raises several further issues under the Chartered Professional Accountants Act and the broader principles governing statutory regulators. These include the following potential breaches or governance failures:

1. Conflict between CPABC’s public interest object and member or industry advocacy.

Section 3 of the CPA Act requires CPABC to protect the public interest while also representing members. Publishing one-sided industry narratives under CPABC branding risks privileging member or industry interests over the public interest. This risk is illustrated by the uncritical presentation of SFI certification and Canfor’s practices as evidence of sustainability.

2. Improper use of the regulator’s authority and platform.

As a statutory regulator, CPABC must not use its institutional authority to lend credibility to contested or incomplete claims. The article presents sustainability claims under CPABC’s official platform, which may reasonably be perceived as regulatory endorsement rather than neutral reporting.

3. Breach of the duty of institutional independence and impartiality.

Statutory regulators are required to act independently and avoid communications that compromise public confidence in their neutrality. Featuring and promoting an industry executive’s sustainability narrative on a contested environmental issue risks undermining the appearance and reality of regulatory impartiality.

4. Potential professional conduct issues arising from the CEO’s dual role as regulator and member.

Ms. Mathison is herself a CPA and subject to CPABC's Code of Professional Conduct, including duties of integrity, objectivity, and avoidance of misleading statements. Publishing incomplete or misleading sustainability claims under CPABC authority may engage professional conduct considerations in addition to governance concerns.

5. Regulatory capture risk within the meaning of the Professional Governance framework.

The Professional Governance Act and the mandate of the Office of the Superintendent of Professional Governance are expressly intended to prevent regulators from being unduly influenced by the professions or industries they regulate. The uncritical adoption of industry sustainability narratives in this article raises a prima facie concern of regulatory capture.

Accordingly, we respectfully request that:

1. CPABC review this publication for compliance with CPABC's public interest mandate and governance obligations, and provide a written response setting out its findings.
2. CPABC explain the standards it applies in assessing the accuracy and reliability of sustainability claims in its public communications.
3. CPABC and Ms. Mathison be afforded the opportunity to retract, correct, or substantially revise the article to remove misleading representations.

For transparency, we have copied the Office of the Superintendent of Professional Governance and the Minister of Post-Secondary Education and Future Skills because this matter concerns CPABC's own public communications and the conduct of its senior executive, creating an inherent conflict if CPABC is required to review itself without external visibility.

This complaint is submitted in good faith and in the public interest. Sustainability reporting is becoming a central pillar of financial and regulatory governance. If statutory regulators adopt industry narratives uncritically, the integrity of ESG and sustainability assurance is undermined.

I would welcome confirmation of receipt and information on the process that will follow.

Sincerely,

Joe Karthein  
President, Save What's Left Conservation Society

#### Annex A – Public Indicators of Unsustainable Harvesting in Canfor's Operations

Publicly available information in British Columbia identifies the following indicators in relation to Canfor Corporation's operations:

- Repeated mill closures and curtailments across northern and interior British Columbia over the past decade, attributed to fibre shortages and declining timber supply.

- Significant downward revisions in allowable annual cuts in several Canfor operating areas, reflecting long-term depletion of high-quality timber.
- Chronic fibre supply constraints acknowledged in Canfor's own public disclosures and investor communications.
- Concentration of harvesting in high-value old and mature forest types, with increasing reliance on lower-quality residual stands.

These indicators are widely discussed in forest economics and policy as evidence of overharvesting and resource depletion, and are inconsistent with claims of long-term ecological sustainability.