



Supply Base Report:

Grand River Pellets, Limited Second Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

Version 1.0	Published 26 March 2015
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025
Version 2.3	Published 14 August 2025

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1 Overview

Producer name:	Grand River Pellets, Limited
Producer address:	300 Union Street, E2L 4Z2 Saint John, Canada
SBP Certificate Code:	SBP-04-41
Geographic position:	47.188100, -67.928700
Primary contact:	Katherine Carrier, , carrier.katherine@jdirving.com
Company website:	https://www.grandriverpellets.com/en/
Date report finalised:	17 Jul 2025
SBR reporting period from:	01 Jun 2025
SBR reporting period to:	31 May 2026
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	30 Jun 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Canada (New Brunswick), United States (Maine), Canada (Quebec)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Grand River Pellets, Limited (GRP) manufacturing facility is located in Saint Leonard, New Brunswick, Canada. GRP is owned by J.D. Irving Limited who owns land in Canada & USA. J.D. Irving main area of business is lumber manufacturing; GRP recuperates the by-products from the sawmills to produce high quality pellets. The pellets produced by GRP are then exported to the global market via the Port of Belledune, New Brunswick. J.D. Irving Limited is also SFI certified.

Products included in the scope of SBP Certification: WB 1.1 Wood pellets

Number of employees: 36

Annual maximum production capacity (metric tonnes): 250000

Number of direct feedstock suppliers: 1

Approximate number of feedstock sub-suppliers: 20

Description of the chain-of-custody and upstream supply chain:

Grand River Pellets Ltd (GRP) purchase feedstock from JDI Woodlands that supplies processing residues and primary feedstock to our operation. JDI Woodlands delivers directly to GRP. The material is weighted in at the scale and then unloaded in GRP's yard. All of the material is SFI certified; hence, there is no need to do physical separation. We also maintain a mass balance for incoming feedstock and exiting pellets.

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Canada
Area/Region	New Brunswick
Exclusions	N/A
Feedstock types	Primary, Processing residues ¹
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority

Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
All feedstock is certified to an SBP- recognized controlled scheme (SFI/PEFC). The gaps between RRA and PEFC were mitigated.	
Feedstock types included in SBE:	Primary, Processing residues ¹
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	7.2900

Map(s) of the Supply Base area:



Country	United States
Area/Region	Maine
Exclusions	N/A
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock

Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
All feedstock is certified to an SBP- recognized controlled scheme (SFI/PEFC).	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	9.1000
Map(s) of the Supply Base area:	



Country	Canada
Area/Region	Quebec
Exclusions	N/A
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

Provide a concise summary of why a SBE was determined to be required or not required here:

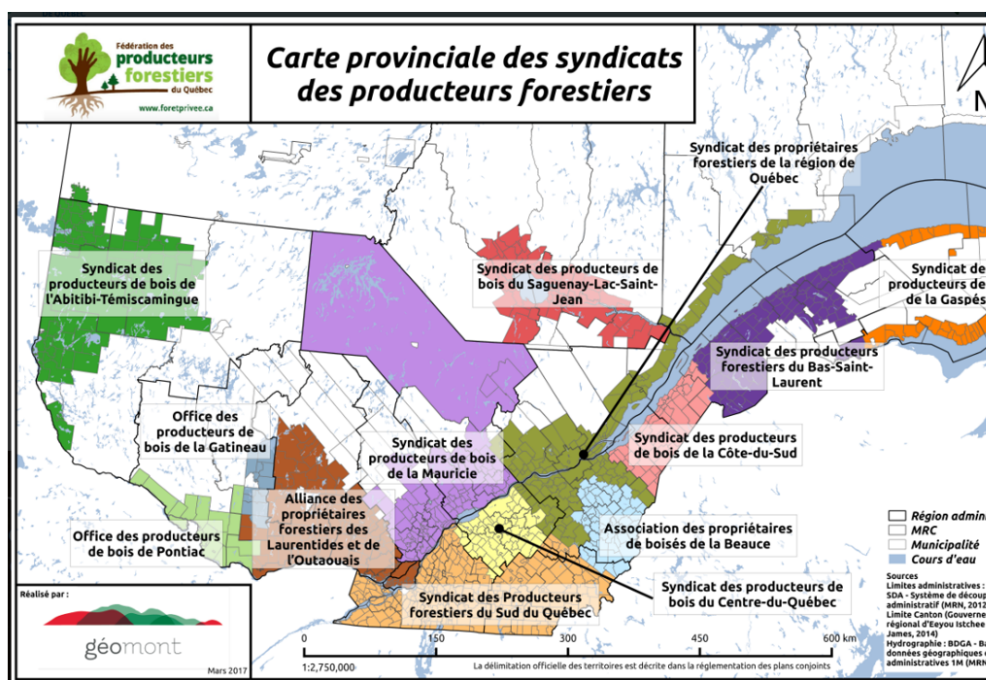
All feedstock is certified to an SBP- recognized controlled scheme (SFI/PEFC).

Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.0024

Map(s) of the Supply Base area:

We use from:

- Cote du sud
- Bas-Saint-Laurent
- Gaspésie



2.3 Feedstock information

a. Total volume of Feedstock: 400,000-600,000 tonnes

b. Volume of primary feedstock: 1-200,000 tonnes

c. List of all the species in primary feedstock, including scientific name:

Abies balsamea	Balsam Fir
Picea rubens	Red Spruce
Picea glauca	White Spruce
Picea mariana	Black Spruce
Picea abies	Norway Spruce
Pinus banksiana	Jack Pine
Pinus strobus	White Pine
Pinus resinosa	Red Pine
Larix laricina	Tamarak
Tsuga canadensis	Hemlock
Thuja occidentalis	Eastern White Pine
Acer saccharinum	Sugar Maple
Acer rubrum	Red Maple
Acer pensylvanicum	Striped Maple
Betula alleghaniensis	Yellow Birch
Betula papyrifera	White Birch
Betula populifolia	Grey Birch
Fagus grandifolia	Beech
Quercus rubra	Red Oak
Quercus macrocarpa	Bur Oak
Populus tremuloides	Trembling Aspen
Populus balsamifera	Balsam Poplar
Populus grandidentata	Large Tooth Aspen
Ostrya virginiana	Ironwood

d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? No

Explanation:

- e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 19.52
- f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 80.48
- g. Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. Indicate how you determine the proportion of saw log:** Specification issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which the wood was grown.
- i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0.00
- j. Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. Volume of primary feedstock from primary forest:** 0
- m. Volume of processing residues feedstock:** 200,000-400,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Offcuts, Other (specify)
- n. Share of SBP-recognised system claim for processing residues:**

100 % PEFC

100 % SFI

- o. Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Offcuts, Other (specify)
- p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:**
 500000 tonnes
- q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 100000.00 tonnes
- Explanation:** We are presently utilizing approximately 70 000 green tons sustainably from harvest. The annual harvesting is based on long term harvesting plan to ensure forest health and is revised yearly. We estimated that we could increase the harvest feedstock to 100 000 tonnes sustainably.

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ Not Applicable – Supply Base Evaluation not implemented

3.1 Summary of the Supply Base Evaluation

The supply base evaluation was conducted for the primary fiber coming from J.D. Irving industrial private land. The secondary fiber that is coming to GRP is from an SBP recognized scheme (SFI certified forest).

Utilizing SBP'S Regional Risk Assessment for New Brunswick, we identified the indicators that were specified risk and we addressed them.

3.2 Conflicts with applicable national and sub-national legislation

There is no conflict.

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Canada	
Area/sub-scope: Black Brook area, New-Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	

2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
As of March 2024, there is no publicly available information describing the implementation mechanisms for managing the suite of landscape-level and stand- level biodiversity values applicable on industrial private land and private woodlots. Owners of industrial private land and private woodlots are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight and/or monitoring framework for landscape-level and stand- level biodiversity values on industrial private land and private woodlots.
Mitigation measure:
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification
Monitoring and outcomes:
Maintaining SFI certification active and annual audit.

Country: Canada
Area/sub-scope: Black Brook area, New Brunswick
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:

2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.

Description of the specific risk:

As of March 2024, there is no publicly available information describing implementation mechanisms that prevents the conversion of forests on industrial private land and private woodlots. Conversion is implemented at the landowner's discretion.

As of March 2024, there is no publicly available information describing an oversight or monitoring framework that prevents the conversion of forests on industrial private land and private woodlots. Owners are responsible for the oversight of operations.

Mitigation measure:

SFI Objective 1. Forest Management Planning To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion or afforestation of ecologically important areas.

Tops and branches of mature hardwood trees are used for feedstock. This confirms the land was in forest in January 2008.

Regulation covers wetland/peat land: 90-80 under the clean water act for N.-B.
(<https://laws.gnb.ca/en/document/cr/90-80>)

The regulation does not allow forest operation within wetlands & peatland; therefore, they can not be converted.

Monitoring and outcomes:

Maintaining SFI certification active and annual audit.

Continue following the clean water act by supervisor monitoring of Standard Operating Procedures (SOP).

Country: Canada

Area/sub-scope: Black Brook, New Brunswick

Risk Assessment used:

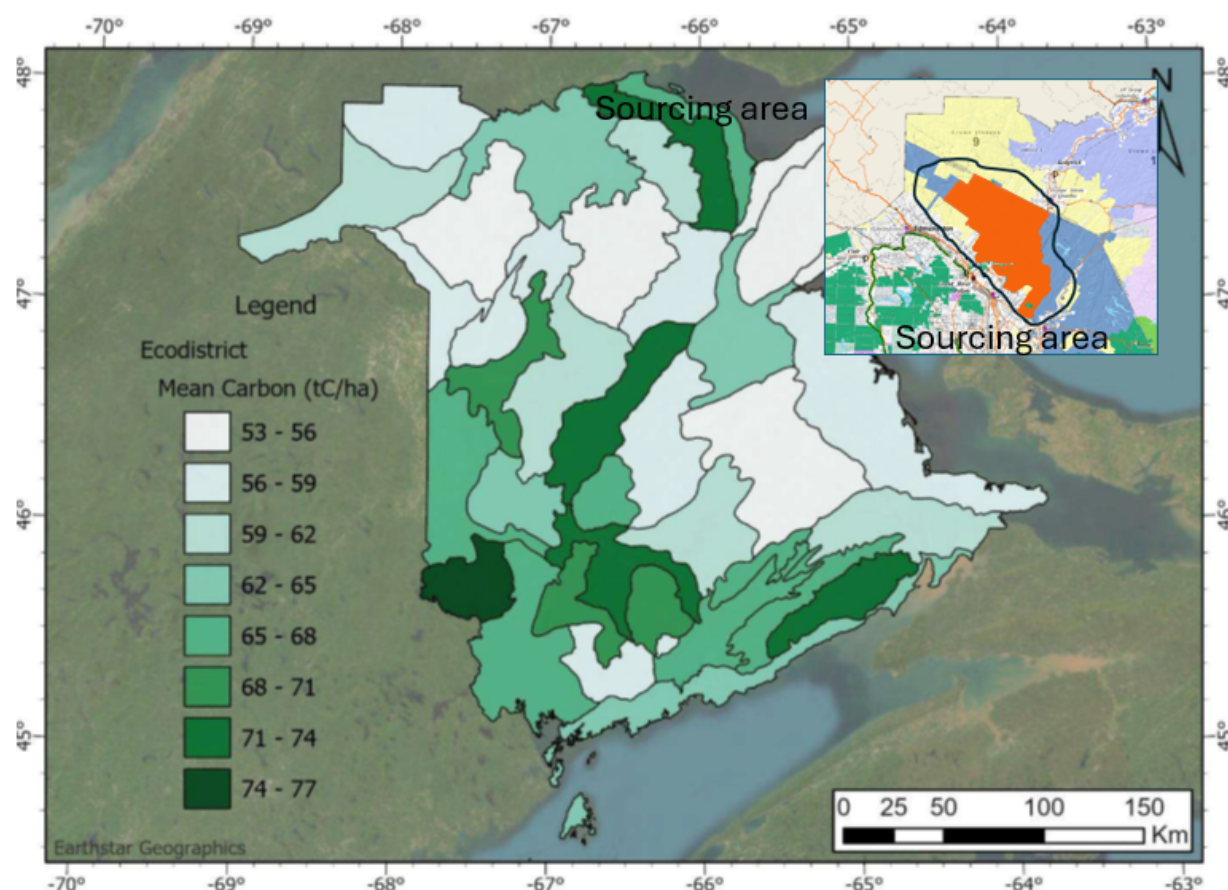
- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed

	☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.	
Description of the specific risk:	
As of March 2024, there is no publicly available information describing implementation mechanisms that restricts timber harvesting from low productivity or difficult to regenerate sites on industrial private land. Owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework that confirms timber harvesting avoids low productivity or difficult to regenerate sites on industrial private land.	
Mitigation measure:	
The crown license criteria used to determined low productivity or difficult to regenerate sites is also used in our industrial private land during management planning process.	
Monitoring and outcomes:	
Ensuring that the same criteria is followed during the management planning process. Each time a management plan is produced it is verified to ensure it is the same criteria as the crown license.	

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim

	☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
As there is no regulatory framework, provincial policy or planning direction specific to high carbon stock forests, there is no publicly available information describing the implementation mechanisms for the management of high carbon stocks on Crown license, industrial private land and private woodlots. The implementation mechanisms for high conservation values were described in the assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown license, industrial private land and private woodlots. As of March 2024, there is no publicly available information describing an oversight and/or monitoring framework to prevent harvesting forests with the combined attributes of high carbon stocks and high conservation values on Crown license, industrial private land and private woodlots. As of March 2024, there is no publicly available results to verify that harvesting of primary feedstock is not sourced from forests that have combined attributes of high levels of carbon stocks and high conservation values on Crown license, industrial private land and private woodlots. The assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced concluded that for biodiversity values specific to high conservation value forests (i.e., key habitat attributes and species at risk, including old forests) are a focal point and that uncertainty as to the maintenance of some biodiversity values was determined, resulting in specified risk for that Indicator on Crown license, industrial private land and private woodlots.	
Mitigation measure:	
The Forestry Carbon Inventory Report shows that we are not harvesting High Carbon Value area. GRP Ltd. only accepts wood from the Black Brook area which is in a low carbon area. https://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/nb-live-forest-carbon-inventory-report.pdf In 2023, there was an estimated 377 M tC stored above-and below-ground in living stems $\geq$ 1 cm DBH on NB forestlands (6.1 M ha); averaging 61.6 tC/ha with a standard error of 0.38 tC/ha and an uncertainty of 1.03%. The highest mean carbon value of 75.5 tC/ha was identified in the Cranberry Ecodistrict (130,000 ha),	

located in the Southwest of the province along the border with Maine (Fig. 3.1). In contrast, the Caraquet Ecodistrict (210,000 ha), part of the Acadian Peninsula in the Northeast, expressed the lowest mean carbon estimate at 53.5 tC/ha. Generally, the mean carbon was observed to be higher in the Southwest of the province and lower along the coast. Across Ecodistricts, mean C was negatively associated (Pearson correlation; $r = -0.44$) with the proportion of low merchantable volume stands ($<35 \text{ m}^3/\text{ha}$).



Report NB-FPSB-2024-1

Monitoring and outcomes:

Follow the latest version of the report to ensure that we are not harvesting High Carbon Value area.

Country: Canada

Area/sub-scope: Black Brook, New Brunswick

Risk Assessment used:

☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim

	☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.1 Negative social and community impacts shall be identified and avoided.	
Description of the specific risk:	
As of March 2024, there is no publicly available information describing implementation mechanisms related to the identification and avoidance of negative social and community impacts on industrial private land. DNRED has requested summary details of the forest management strategy for industrial private land operations. As of March 2024, there is no publicly available information describing an oversight framework related to the identification and avoidance of negative social and community impacts on industrial private lands.	
Mitigation measure:	
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification	
Monitoring and outcomes:	
Maintaining SFI certification active and annual audit.	

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRR-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRR-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRR-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRR-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRR-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRR-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRR-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRR-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRR-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.4 Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.	
Description of the specific risk:	
The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and committed to its implementation was endorsed by the Government of Canada in 2016. The Constitution Act, 1982, section 35 recognises Indigenous Peoples' rights and provides legal protection to rights defined after 1982. The federal United Nations Declaration on the Rights of Indigenous Peoples Act (UNDRIP Act), which came into force in June 2021, was established to affirm UNDRIP as an international human rights instrument that can help interpret and apply Canadian law. As of January 2024, New Brunswick (NB) has yet to pass an equivalent legislation. Under the Mi'gmaq and Wolastoqiyik / New Brunswick / Canada Umbrella Agreement (2011), the Mi'kmaq and Wolastoqey Peoples have asserted rights to use and occupy ancestral lands/traditional territories. In 2019, the government of Canada and a group of Mi'kmaq chiefs reaffirmed the commitment to advancing reconciliation. There are three tri-partite tables negotiating how First Nations rights will be recognised and implemented: • Canadian government, NB government, and Mi'kmaq First Nation; • Canadian government, NB government, and Wolastoqey First Nation; • Canadian government, NB government and Peskotomuhkati First Nation. The Crown Lands and Forests Act (CLFA) sets out the forms of tenure and licensing the provincial government can enter into regarding the forest resource. S.4 of the CLFA authorises the Department of Natural Resources and Energy Development (DNRED), with the approval of the Lieutenant-Governor, to enter into agreements with "a band council as defined in the Indian Act." The NB Department of Indigenous Affairs document Government of New Brunswick Duty to Consult Policy "outlines the types of decisions that may trigger the duty to consult, the roles and responsibilities of the federal and provincial governments and First Nations and provides guidance to ensure that adequate consultation has taken place on matters that may affect Aboriginal and treaty rights." In 2019, the NB Department of Indigenous Affairs released the Interim Proponent Guide: A Guide for Proponents on Engaging with Aboriginal Peoples in New Brunswick, which provides general guidance to project proponents on engagement, consultation, and accommodation with First Nations. Forestry is not mentioned in the guide. See Indicator 4.2.6 Consultation/Accommodation for further information on consultation. The Mi'kmaq and Wolastoqey First Nations have asserted Aboriginal title rights on crown land and industrial private land. As of March 2024, there is no publicly available information regarding Indigenous Peoples' tenure and use rights being asserted on private woodlots in NB.	

The three tri-partite tables provide oversight on how First Nations rights will be recognised and implemented. The Mi'kmaq and Wolastoqey First Nations have asserted Aboriginal title rights on crown land and industrial private land. The courts are providing the oversight. As of March 2024, there is no publicly available information regarding oversight with respect to Indigenous Peoples' tenure and use rights on private woodlots in NB. Indigenous rights have been affirmed through the federal Constitution Act and UNDRIP Act. These rights are being defined through the court system and tri- partite negotiations. In July 2019, Canada and the Mi'kmaq re-affirmed a commitment to negotiate a solution for "the implementation of Aboriginal and treaty rights, the resolution of Aboriginal title, and self-determination of the Mi'gmaq of New Brunswick". First Nations contributed to the selection of additional protected areas announced in 2022.

There was consultation with First Nations during the development of the 2023 forest strategy Our Forests are for Everyone: A Long-term Management Strategy for Healthy & Sustainable Forests. An agreement between the government and First Nations was reached during the consultation on the forest strategy, which is intended to support First Nations engagement and provide benefits. DNRED stated there was consultation regarding forest planning and an assessment of the timber allocations to each community. A Ministers' and Chiefs' Forest Advisory Table was formed as a result of the forest strategy consultation process. As of March 2024, there is no publicly available information if DNRED have entered into agreements with First Nations as outlined in S.4 of the CLFA. In 2016, seven Mi'kmaq First Nations Chiefs filed a lawsuit against the NB government over its forest policy and management agreements with industrial forestry companies. The Chiefs opposed the 2014 Putting our Resources to Work A Strategy for Crown Lands Forest Management which allowed a 20% increase in the annual allowable cut of softwood on Crown licenses and would reduce the amount of Crown license that is off-limits to the forest industry from 30% to 23%. As of March 2024, there is no publicly available information on negotiation progress. In 2020, six Wolastoqey First Nations (Oromocto, Woodstock, Saint Mary's, Kingsclear, Tobique, and Madawaska First Nations) filed suit against NB, stating the provincial government had not properly consulted regarding the management and use of Crown lands. The First Nations claim treaty rights, which include the right to harvest timber for their own use and economic benefit, are not being recognised by the provincial government. As of March 2024, there is no publicly available information on negotiation progress.

In November 2021, the Wolostoqey amended the claim by adding a number of industrial corporations, including many forestry companies, on the basis that the corporations have been using and benefitting from Crown lands and resources within the claim area. The claim also included specific property identification numbers for industrial freehold lands, as well as Crown land. In February 2023, the Mi'kmaq assertion of title was expanded to the majority of NB. "Our assertion of title is against the Crown and a small number of companies using industrial freehold lands in which the Crown still asserts an interest."

In August 2023, the NB government filed a motion in New Brunswick Court of King's Bench asking the court to strike out several sections of the claim by six Wolastoqey First Nations and to "remove all claims against and/or in relation to fee simple lands." As of March 2024, there is no publicly available information on negotiation progress.

The six Wolastoqey Nations in NB requested the corporate owners issue certificates of pending litigation against the thousands of acres of land they use for commercial timber operations. In a February 2024 decision, the Court of Kings Bench upheld a motion filed by the industrial defendants asking the court to deny the request. The First

Nations have appealed. As of March 2024, the matter is before the courts. New Brunswick has allocated 5% of the provincial annual allowable cut to First Nations communities. The First Nations control how the land is harvested, but do not pay stumpage. As of March 2024, there is no publicly available information regarding the Mi'kmaq and Wolastoqey First Nations asserting tenure and use rights on private woodlots.
Mitigation measure: It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification
Monitoring and outcomes: Maintaining SFI certification active and annual audit.

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk: 4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.	
Description of the specific risk: Section 35 of the Constitution Act, 1982 recognises and affirms the existing Aboriginal and treaty rights of the Indigenous Peoples of Canada. The federal government is responsible for the well-being of Indigenous Peoples. The Constitutional Act, 1867 gave the provinces ownership and authority over natural resources. Indigenous Peoples'	

rights continue to be defined and delineated via the courts in New Brunswick (NB). The Mi'gmaq and Wolastoqiyik / New Brunswick / Canada Umbrella Agreement (2011) sets out the conditions for negotiating a framework agreement including provisions regarding consultation. The areas to be negotiated included lands and resources. The NB Department of Indigenous Affairs documents Government of New Brunswick Duty to Consult Policy and Interim Proponent Guide: A Guide for Proponents on Engaging with Aboriginal Peoples in New Brunswick provide guidance when consulting with First Nations. The 2014 Forest Management Manual for New Brunswick Crown Lands (FMM) does not reference any consultation requirements for Indigenous communities to provide input into Forest Management Plans (FMPs). As of March 2024, there is no publicly available information regarding engagement or consultation processes between Indigenous Peoples and industrial private land or private woodlots.

The framework agreements between the federal government, provincial government and First Nations set out the oversight framework for consultation. The NB Department of Indigenous Affairs oversees the consultation related to forest planning and assesses its sufficiency. As of March 2024, there is no publicly available information regarding consultation oversight between Indigenous People and owners of industrial private land or private woodlots. Agreements have been signed for tri-lateral negotiations between Canada, NB, and the Mi'kmaq, Wolastoqey, and Peskotomuhkati First Nations. As of March 2024, there is no publicly available information on the progress made in the bi-lateral and tri-lateral negotiations. As of March 2024, there is no publicly available information on free, prior and informed consent (FPIC) agreements with Indigenous People in NB. As of March 2024, there is no publicly available information if Crown licensees have consulted with First Nations on FMPs or Annual Operating Plans (AOPs). Starting in 2024/25, licensees are required to consult during AOPs. As of March 2024, there is no publicly available information regarding consultation and accommodation between the owners of industrial private land and First Nations even though First Nation have asserted rights. As of March 2024, there is no publicly available information regarding consultation requirements on private woodlots.

Mitigation measure:

It is fully covered by the SFI forest management certification.

Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification

Monitoring and outcomes:

Maintaining SFI certification active and annual audit.

Country: Canada

Area/sub-scope: Black Brook, New Brunswick

Risk Assessment used:

☐ SBP-RRR-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim

	☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
See Indicators: • Indicator 2.2.3 – Soil Quality Maintained or Enhanced; • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem; • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; • Indicator 2.2.9 – Long-term Production Capacity; • Indicator 2.2.10 – Regen After Harvest; • Indicator 2.2.11 – Natural Processes are Managed.	
Mitigation measure:	
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification	
Monitoring and outcomes:	
Maintaining SFI certification active and annual audit.	

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
On industrial private land, there are no regulatory requirements to manage or maintain soil quality. As of March 2024, there is no publicly available information describing implementation mechanisms to manage or maintain soil quality. On industrial private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework to manage or maintain soil quality on industrial private land.	
Mitigation measure:	
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification	
Monitoring and outcomes:	
Maintaining SFI certification active and annual audit.	

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed

	☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.	
Description of the specific risk:	
On industrial private land, as of March 2024 there is no publicly available information describing whether or how long-term sustainable harvest levels are determined. On industrial private land, oversight of forest management and actual harvest is managed by the landowner. As of March 2024, there is no publicly available information describing an oversight framework for long-term sustainable harvest levels.	
Mitigation measure:	
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification	
Monitoring and outcomes:	
Maintaining SFI certification active and annual audit.	

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim

	☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
As of March 2024, there is no publicly available information describing implementation mechanisms for regeneration on industrial private land. On industrial private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework for regeneration on industrial private land.	
Mitigation measure:	
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification	
Monitoring and outcomes:	
Maintaining SFI certification active and annual audit.	

Country: Canada	
Area/sub-scope: Black Brook, New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	

4.2.7 Designated cultural heritage sites shall be preserved.
Description of the specific risk:
On industrial private land, the owner is responsible to obtain all necessary DELG permits and certificates prior to any pesticide use. As of March 2024, there is no publicly available information describing implementation mechanisms for pesticides use. Beyond DELG monitoring, as of March 2024, there is no publicly available information describing an oversight framework for pesticide use on industrial private land. Landowners are responsible for the oversight of operations.
Mitigation measure:
It is fully covered by the SFI forest management certification. Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification
Monitoring and outcomes:
Maintaining SFI certification active and annual audit.

Country: Canada
Area/sub-scope: Black Brook, New Brunswick
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Description of the specific risk:

On industrial private land, there are no utilisation regulatory requirements or defined standards. Utilisation is implemented at the landowner's discretion. As of March 2024, there is no publicly available information describing implementation mechanisms for the removal of harvest residues and not negatively impacting the ecosystem on industrial private land.

On industrial private land, landowners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework for harvest residue removal.

Mitigation measure:

It is fully covered by the SFI forest management certification.

Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification

Monitoring and outcomes:

Maintaining SFI certification active and annual audit.

Country: Canada

Area/sub-scope: Black Brook, New Brunswick

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

4.1.8 Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.

Description of the specific risk:

The Association of Registered Professional Foresters of New Brunswick (ARPFNB) is responsible for

ensuring compliance with the New Brunswick Foresters Act and provides professional training opportunities. ARPFNB assesses applicants for admittance to the organisation in New Brunswick (NB). As of March 2024, providing forestry services in NB is unregulated. Anyone can offer and provide forestry services without qualifications or oversight. The practice of forestry (as described in the New Brunswick Foresters Act) is the “application of scientific principles to the management of forest ecosystems including: integrated forest management, evaluation of forest land, classification and inventory of forest land, silviculture, planning roads, teaching of forestry subjects at university and technical levels, research related to the management of forests and forest land, and providing advice, performing or directing work whether or not in return for a fee or remuneration.” Registered Professional Foresters (RPFs) are required under the New Brunswick Foresters Act to maintain competence through the continuing competency program. All registrants must complete 36 hours annually and obtain 100 contact hours of continuing competency activities/professional development over a three-year period. An RPF must maintain a tracking form and submit the educational records on an annual basis. ARPFNB, with its by-laws, ensures its members competence and integrity to uphold public interest by requiring members to follow the continued competency program defined by its Executive Committee. The Department of Environment and Local Government (DELG) has the responsibility to issue Watercourse and Wetland Alteration Permits. Permits are issued to individuals who successfully passed a certification course and examination. To obtain such permits, the applicant must have followed and successfully pass a watercourse alteration certification course offered by a DELG recognised education organisations. DELG prepares and offers technical guides to support compliance to various legislations. DELG also partner with education institutes to offer recognised courses such as the watercourse alteration certification course. The Scalers Act requires all scalers be licensed and authorised by the Department of Natural Resources and Energy Development (DNRED) to conduct scaling of primary forest products harvested from NB Crown license or primary forest products marketed through a producer association. Applicants must have two years previous experience assisting a licensed scaler or have graduated from a post-secondary program that is equivalent to two years of experience in scaling primary forest products. Applicants are examined by the DNRED Board of Examiners and recommendations for licensing are forwarded internally within DNRED for issuance of a scaling license. Licenses are renewed every five years. Forest companies are responsible for ensuring forest workers have the proper training and certificates to effectively implement roles and responsibilities. Training completion and documentation is a component of a forest company’s health and safety program. Forest companies implement training policies through various meetings with contractors, which includes operations-specific information. Contractors provide proof of training to forest companies if requested. Like forest companies, contract companies are responsible for ensuring employees have training and obtain certificates which demonstrate qualifications. The New Brunswick Federation of Woodlot Owners advocates for the interests and the rights of private woodlot owners, coordinates educational opportunities, sources funding to implement projects, and keeps private woodlot owners up to date on what is going on with industry, the government and forest product marketing boards through monthly newsletters. As of March 2024, there is no publicly available information describing systematic and consistent training to forest workers across the forest industry in NB. ARPFNB has the oversight authority of the New Brunswick Foresters Act. ARPFNB will annually conduct a

randomly selected 5% sample of its registered members to ensure that the membership is meeting the continuing competency program requirements. Activities are evaluated over a rolling three-year period. Members not meeting the program requirements as determined by the audit must submit a training plan which identifies how shortfalls will be met over the next 12 months. DNRED and Marketing Board representatives have the responsibility to report any observations of dangerous and ill-conceived practices caused for example by inappropriate training. DELG has oversight over the Watercourse and Wetland Alteration training program in NB. Stop work orders can be issued if permits are not in place, or if the person conducting the work does not have the proper training. DNRED has oversight over the Scalers Act. Stop work orders can be issued if an individual does not have a scaling license. Company oversight/tracking is completed through internal company-specific processes. As of March 2024, there is no publicly available information describing an oversight framework or reporting of forest worker training. ARPFNB annual reports are not publicly available. Compliance with the Watercourse Alteration Regulation is the responsibility of DELG and the Authorizations and Compliance Division. Annual reports do not describe non-compliance issues nor potential causes such as workers' competencies. DELG annual reports provide summaries of the Watercourse Alteration Program. In 2021/22, 2,072 permits were issued and four permits were refused. The Watercourse Alteration Certification Program is striving to include all road builders. Fifty-nine individuals were certified in 2021/22, bringing the total to 665 certified individuals in NB. Company-specific forest worker health and safety training

Mitigation measure:

It is fully covered by the SFI forest management certification.

Evaluation of the Programme for the Endorsement of Forest Certification (PEFC) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification

Monitoring and outcomes:

Maintaining SFI certification active and annual audit.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 19 May 2025

Biomass Producer's stakeholder engagement end date: 16 Jun 2025

Total number of stakeholders contacted: 5

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

The stakeholders were selected based on the potential impact of GRP activities on their operations within the sourcing areas. The stakeholders identified included the NB Forest Advisory Committee, Natural Resources Canada, Ducks Unlimited Canada, the Nature Conservancy of Canada, and Trappers Northern New Brunswick. In accordance with our stakeholder engagement plan, no consultations were conducted this year, as no operational changes occurred that would warrant stakeholder input. Consequently, no comments or feedback were received from the stakeholders.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

Summary of changes: N/A

Name	Reg Woods
Title	Management representative
Date of report approval	17 Jul 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Canada
Area	New Brunswick
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-CA-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-CA-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-CA-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In the area that we are utilizing primary fiber, there is no primary forest, old growth forest and no go areas other than wet lands which are excluded from the harvesting plan. The indicator 2.1.3 specify that the Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced. This is fully covered under GRP's SFI certification.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level

	☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	This is fully covered in GRP's SFI certification.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i>	

(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable, requirement only applies to Level A

LULUCF criteria 29(7)

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

Each load received is weighed and recorded at a certified scale. A scale ticket is produced with a unique number. The scale ticket contains the origin, product, destination & weight. We have a database that registers all loads along with the origin's information (name, location, type of supplier). A report can be generated at any time to verify, and monitor deliveries. In the event that there is an error on the documentation, it is addressed by investigating the proper information and corrected in the database. If a load does not meet the SBP definition of secondary/tertiary feedstock after inspection, it is segregated and then returned to the supplier.

Feedstock inspection and classification upon receipt

The feedstock being delivered is visually inspected by the loader operator and stored accordingly. In the event that a load does not meet the visual inspection, it is segregated for further inspection by the quality manager where it will be decided what is the proper course of action. The material is tested for moisture and registered in our quality database. The scale ticket & numbers are registered in the scale system.

Supplier audit for processing residues and post-consumer feedstock

All processing residues were identified upon receipt; hence, we were not required to do any supplier audit during the auditing year.

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).