



Supply Base Report:

Pinnacle Renewable Energy Inc (Armstrong Division) Fourth 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

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1 Overview

Producer name:	Pinnacle Renewable Energy Inc (Armstrong Division)
Producer address:	3480 Pleasant Valley Road, V0E 1B0 Armstrong, Canada
SBP Certificate Code:	SBP-06-61
Geographic position:	50.447500, -119.194400
Primary contact:	Joseph Aquino, +1 250 562 5562 ext 2220, Joseph.Aquino@drax.com
Company website:	https://www.drax.com/northamerica/?source=pinnacle
Date report finalised:	22 Apr 2026
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Control Union Certifications BV
Certification Body Approval date:	21 Aug 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. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Canada (Alberta), Canada (British Columbia), United States (Pacific Northwest)
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

Pinnacle Renewable Energy Inc, Part of Drax is a company with head office for the Canadian sites in Prince George (8545 Willow Cale Road) which owns or partially owns 8 pellet plants and one port facility across northern and interior British Columbia and two pellet plants in north western Alberta. The 10 Canadian pellet plants produce wood pellets from processing (sawmill) residues & forest feedstock (harvest residues and nonmerchantable roundwood). Finished pellets are loaded into railcars and sent to port facilities at either Westview Terminal (owned by Pinnacle) or to Fibreco (third party). Raw material is purchased by the Fiber Team at the Prince George office and distributed to the mills based on their need, distance and equipment. Each mill inspects and records the incoming fibre, registers tonnage, type and suppliers in a centralized database system. Production and output are recorded, along with dump reports from the two terminals. Each port maintains a railcar log.

Sales tonnage is measured in a draft survey of the loaded vessel. Tonnage of input and output as well as mass balance are maintained by the Sustainability Team in the Prince George office. Based on the feedstock the company will be able to sell SBP SDE+ compliant CAT 5 biomass made from sawmill/industrial residuals, material with a PEFC/SFI certified or PEFC/SFI controlled claim.

Transaction certificate application and sale records are managed by the Sustainability Team at the Prince George office. Occupational health and safety procedures, training requirements and reporting systems are centrally managed. Mill operation log, preventative maintenance and corrective repair logs, job duties, combustible dust programs, and training of employees, and safety incentives are managed at each mill but are using a common management and tracking system for safety items and training.

Pinnacle Renewable Energy - Armstrong Division is a pellet plant with 2 presses able to produce approximately 70000 MT per year, the plant has been running since 2007. Products included in the scope of SBP Certification: Pellets

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

Number of employees: 17

Annual maximum production capacity (metric tonnes): 70000

Number of direct feedstock suppliers: 7

Approximate number of feedstock sub-suppliers: 5

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

The Organization is holding valid PEFC and SFI Chain of Custody certificate systems which they share through a multi-site with the other pellet production facilities. Valid PEFC/SFI system description and other documents exist. The organization operates the percentage based method for controlling PEFC/SFI claims based on volume credits. Pinnacle also verifies PEFC/SFI Controlled Sources through a DDS including a risk assessment covering British Columbia, Alberta, Saskatchewan, Alaska, Washington, Oregon, California, Idaho, Montana, & Wyoming.

All wood fiber is tracked through the process from the District of Origin through the mill to the final bill of sale. Pinnacle uses a database to gather and control information related to the feedstock such as supplier name, scale tickets, fiber type, certification, and district of origin. Pinnacle has appropriate control mechanisms to calculate output volumes, claims and trademark/logo approval. Additionally, Pinnacle conducts an annual Management

Review of the commitments, programs and procedures to evaluate the overall effectiveness of the SBP management system. The organizations PEFC/SFI management system and procedures were previously evaluated by another certification body and no open nonconformities exist. The organization has detailed and comprehensive procedures and databases to cover the necessary requirements regarding the SBP-approved Chain of Custody system.

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	Alberta
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled 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
Provide a concise summary of why a SBE was determined to be required or not required here:	
SBP Regional Risk assessment has been completed for the province of British Columbia. In the assessment against SBP v2.0 Standard 1 indicators, Specified Risk was identified. To handle SBP compliant feedstock, a company risk assessment was completed.	
Feedstock types included in SBE:	Processing residues
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):	40.0000

Map(s) of the Supply Base area:

Country	Canada
Area/Region	British Columbia
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled 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
Provide a concise summary of why a SBE was determined to be required or not required here:	
SBP Regional Risk assessment has been completed for the province of British Columbia. In the assessment against SBP v2.0 Standard 1 indicators, Specified Risk was identified. To handle SBP compliant feedstock, a company risk assessment was completed.	
Feedstock types included in SBE:	Processing residues
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):	65.0000
Map(s) of the Supply Base area:	

Country	United States
Area/Region	Pacific Northwest
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)

Feedstock inputs	SBP Compliant feedstock , SBP Controlled 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 – Biomass Producer’s own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
SBP Standard 1 states the globally applicable legality and sustainability Indicators that must be evaluated. For the BP to procure non-certified, SBP compliant feedstock from the region, either an SBE or RRA must be completed. There is currently an RRA for Federal Lands, but no RRA for Private & State Lands in the region of Washington, Idaho, Oregon, Montana, Northern California, & Northwest Wyoming.	
Feedstock types included in SBE:	Processing residues
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):	117.5000
Map(s) of the Supply Base area:	
Supply Base - PNW.pdf	

2.3 Feedstock information

a. Total volume of Feedstock: 1-200,000 tonnes

b. Volume of primary feedstock: 0

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

d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Yes - Minority

Explanation: Forests in the supply base are sustainably managed for the lumber & forest product manufacturing industry. As part of this, licensees & forestry companies are provided authority to harvest trees on public lands, with requirements governed by provincial legislation. Sawmills will either be a licensee with harvest authority or purchase logs on the open market from public & private lands. While majority of harvest is for targeting lumber markets, a component of this includes Integrated Pest Management, wildfire risk reduction, & salvage harvesting of damaged stands. In British Columbia, the government apportions levels of harvest to licensees based on the determined Annual Allowable Cut. As part of apportionment, the BC government sets aside small portions of the AAC for small scale salvage & opportunistic projects that address forest health concerns. There are associations in the province such as the Forest Enhancement Society of British Columbia (FESBC) that provide funding to target these projects, including but not limited to wildfire risk reduction, fire rehabilitation projects, thinning / density spacing projects, and other projects that target rehabilitation of the forest where the harvest of the site may not be economically feasible. Apportionment Commitment Reports Site <https://www2.gov.bc.ca/gov/content/industry/forestry/forest-tenures/forest-tenure-administration/apportionment-commitmentreports-aac/historical-apportionment-commitment-reports> 2024 Provincial Apportionment Summary https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/timber-tenures/apportionment/20232024/provincial_summary.pdf There are many resources available referencing pest management in each province; a guidebook to Bark Beetle Management can be referenced as an example of identification of strategies & control measures to address pests in forest management. BC Bark Beetle Management Guidebook https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-health/barkbeetles/bark_beetle_management_guidebook.pdf

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 0.00

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 100.00

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 (%): 100.00

j. Select forest type(s) where the primary feedstock was sourced from: Other Naturally Regenerated Forest

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:

m. Volume of processing residues feedstock: 1-200,000 tonnes

Physical form of the feedstock: Chips, Sawdust, Offcuts, Clean chips or dust

n. Share of SBP-recognised system claim for processing residues:

65.00 % PEFC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Chips, Sawdust, Offcuts, Clean chips or dust

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 100 %

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 96000000.00 m³

Explanation: AAC of both provinces totals 96 million m3

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

See SBP Regional Risk Assessments for British Columbia & Alberta for summary. See below for PNW SBE

Indicator	PNW Private	PNW State
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.1.4	Low	Low
1.1.5	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Specified	Low
2.2.2	Low	Low
2.2.3	Specified	Low
2.2.4	Specified	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.2.10	Specified	Low
2.2.11	Low	Low
2.2.12	Low	Low
3.1.1	Low	Low
3.2.1	Low	Low
3.2.2	Specified	Low
3.2.3	Low	Low
3.3.1	Low	Low
4.1.1	Low	Low
4.1.2	Low	Low
4.1.3	Low	Low
4.1.4	Low	Low
4.1.5	Low	Low
4.1.6	Low	Low
4.1.7	Low	Low
4.1.8	Specified	Specified
4.1.9	Low	Low
4.1.10	Low	Low
4.2.1	Low	Low
4.2.2	Low	Low
4.2.3	Low	Low
4.2.4	Low	Low
4.2.5	Low	Low
4.2.6	Low	Low
4.2.7	Specified	Low

3.2 Conflicts with applicable national and sub-national legislation

n/a

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: Alberta	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
Context - Forest Feedstock Deliveries Prior to receipt of fiber from any Forest Feedstock (logs or bush grind) source, the Fiber Team will submit an approval request to the Sustainability Team via Survey123. Each sub-scope will have an associated "Forest Feedstock Questionnaire" tailored to specified risk identified in each sub-scope of the risk assessment. All versions of the questionnaire will collect spatial information for the origin of the fiber at a harvest unit level. All potential Forest Feedstock sources are to be verified through this process by the Sustainability Team for certification compliance by reviewing the answers provided in the approval request & spatially identifying the applicable management unit in which fiber will be received (Tract, Cutblock, Parcel, etc.). Spatial identification of the harvest unit will be completed by using GIS software. This will include other data & spatial layers from various sources that will confirm the location of the harvest unit (Tract, Cutblock, Parcel, etc.) & its proximity to any specified risk areas identified by the BP.	

- If the BP deems that the specified risks outlined in the risk assessment are being satisfactorily addressed, the feedstock will be considered SBP compliant & purchase of the fiber will proceed.
- If the BP deems that the specified risks outlined in the risk assessment are not being satisfactorily addressed, the feedstock will be considered SBP controlled & purchase of the fiber will not proceed.

Context - Residual Fiber Deliveries

Prior to receipt of fiber from any Residual Fiber (processing residues & tertiary feedstock) source, the Fiber Team will submit an approval request to the Sustainability Team via Survey123. Every supplier will be required to complete a "Residual Fiber Questionnaire" tailored to specified risk identified in each sub-scope of the risk assessment. All versions of the questionnaire will collect spatial information for the supplier's supply base at a sourcing area / county level. This questionnaire will be required by the BP to be filled out on an annual basis to ensure data is accurate & up to date. Spatial identification of the supplier's supply base will be completed by using GIS software. This will include other data & spatial layers from various sources that will confirm the location of the supply base & its proximity to any specified risk areas identified by the BP. The assessment of this indicator identifies specified risk as it relates to four values of key ecosystems & High Conservation Values, all of which will be addressed by verification of the spatial location of the harvest unit in relation to data available to the BP for each of the values. To address the identified specified risk, the BP will implement a Monitoring Forest Feedstock mitigation measure for Forest Feedstock sources, with an Education & Outreach approach for Residual Fiber sources.

Monitoring Forest Feedstock & Avoidance of High Risk Feedstock:

Landscape Level Species at Risk (Caribou)

To address Caribou values, the BP will use the AB Government's Data Centre layer relating to Caribou Zones as the measure for caribou habitat values. This dataset is defined as an area that contains habitat that is necessary to meet the winter habitat requirements of an ungulate species.

In Phase 1 of the Monitoring Forest Feedstock mitigation measure, the BP will check to see if the proposed harvest unit is either overlapping or adjacent to the range polygons. If overlapping or adjacent to the range polygons, the BP will request evidence from the supplier to show that caribou values are being managed for in relation to the harvesting of these sites.

Intact Forest Landscapes

The term IFL is not officially recognized by the Alberta government in its forest management legislation. Although the term is not recognized, the legislation in place (Timber Harvest Planning & Operating Ground Rules) identify targets & requirements for landscape level objectives relating to biodiversity & forest cover management. In these legislated requirements on Public (Crown) land, is a requirement for licensees to manage patch size distribution of harvest units & seral stage percentage distribution across Forest Management Agreement areas in the province. The BP will also consider this legislation in the assessment of risk to Intact Forest Landscapes.

Relating to Public (Crown) Land:

The BP will assess the potential for each IFL in Alberta to be reduced below the threshold of 50,000 ha based on the Forest Management Agreement (FMA) areas. If more than 50,000 ha of the IFL is located outside of FMAs, the BP will consider the IFL to be low risk for harvest to impact the large level landscape HCV. If less than 50,000 ha of an IFL is located outside of an FMA, the BP will consider the IFL as having Specified Risk potential.

For IFLs with Specified Risk potential, the BP will include a spatial review of proposed harvest units in Phase 1 of the Monitoring Forest Feedstock mitigation measure. If overlap is present, the BP will request documented evidence of the supplier's analysis of seral stage distribution targets as required by legislation are being met.

- If there is no overlap with the IFL layer, the Sustainability Team will approve the source as low risk;
- If there is overlap with the IFL layer & the supplier provides evidence to show the landscape level objectives are being met, the Sustainability Team will approve the fiber source as low risk;
- If there is overlap with the IFL layer & the supplier cannot provide evidence of this, or targets are not being met after reviewing the evidence, the Sustainability team will reject the harvest unit as a potential fiber source as specified risk is not being mitigated.

Relating to Private Land:

The BP will assess the potential for each IFL in Alberta to be reduced below the threshold of 50,000 ha based on the government's parcel data for identifying Private & Federal lands. If more than 50,000 ha of the IFL is located outside of private / federal land, the BP will consider the IFL to be low risk for harvest to impact the large level landscape HCV. If more than 50,000 ha of an IFL is located inside of private / federal land, the BP will consider the IFL as having Specified Risk potential.

For IFLs with Specified Risk potential, the BP will include a spatial review of proposed harvest units in Phase 1 of the Monitoring Forest Feedstock mitigation measure. If overlap is present, the BP will request documented evidence of the supplier's analysis of seral stage distribution targets as required by legislation are being met.

- If there is no overlap with the IFL layer, the Sustainability Team will approve the source as low risk;
- If there is overlap with the IFL layer & the supplier provides evidence to show the landscape level objectives are being met, the Sustainability Team will approve the fiber source as low risk;
- If there is overlap with the IFL layer & the supplier cannot provide evidence of this, or targets are not being met after reviewing the evidence, the Sustainability team will reject the harvest unit as a potential fiber source as specified risk is not being mitigated.

Local & Endemic Species at Risk & Ecological Communities

The AB RRA identifies extensive legislation relating to Species at Risk in the province, with the Alberta Open Data platform as a source of information on listed species at risk in the supply base. Specified Risk was a precautionary evaluation concerning the monitoring aspect of forest management practices. To bridge the gap identified in the RRA, the BP will utilize both public & private data sources to identify spatial locations of habitat relating to red listed species & ecological communities in the province & assess the potential for these sites to overlap with harvest units. Both the Open AB list of Species at Risk (public) & the Integrated Biodiversity Assessment Tool (IBAT) (private). The Integrated Biodiversity Assessment Tool (IBAT) is an Alliance between BirdLife International, United Nations Environment Programme - World Conservation Monitoring Centre, The International Union for Conservation of Nature (IUCN) and Conservation International. IBAT is a biodiversity data provider licensing commercial access to global biodiversity datasets and derived data layers including the IUCN Red List of Threatened Species™, the World Database on Protected Areas (WDPA) and the World Database of Key Biodiversity Areas (WDKBA).

To mitigate the risk on Local SAR, the BP will cross reference the provincial list of Species at Risk with a Red List label with the data available in the province from IBAT to identify species to focus on for monitoring exercises.

Relating to Public (Crown) Land

This data will be used in Phase 1 of the Monitoring Forest Feedstock mitigation measure by including a spatial reference to the proposed harvest unit. If the harvest unit overlaps with data from the Species at Risk layer, the BP will request documented evidence of management for Species / Ecological Communities at Risk or relating to the forest management of the site.

- If the supplier provides sufficient evidence that mitigates risk of impact to referenced species, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
- If the supplier cannot provide sufficient evidence that mitigates risk of impact to referenced species, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the Species / Ecological Communities at Risk layer, the site will be considered low risk & the Sustainability Team will approve the potential fiber source
- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites that overlap with the Species / Ecological Communities at Risk layer will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Relating to Private Land

This data will be used in Phase 1 of the Monitoring Forest Feedstock mitigation measure by including a spatial reference to the proposed harvest unit. If the harvest unit overlaps with data from the Species / Ecological Communities at Risk layer, the BP will request documented evidence of management for Species at Risk relating to the forest management of the site. In addition to the spatial reference, the BP will include questions in the applicable Forest Feedstock Questionnaire for landowners / suppliers of fiber from private land types to identify management strategies used to address Species / Ecological Communities at Risk

- If the supplier provides sufficient evidence that mitigates risk of impact to referenced species in the applicable Forest Feedstock Questionnaire, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
- If the supplier cannot provide sufficient evidence that mitigates risk of impact to referenced species in the applicable Forest Feedstock Questionnaire, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the Species / Ecological Communities at Risk layer, the site will be considered low risk & the Sustainability Team will approve the potential fiber source
- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites that overlap with the Species at Risk layer will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Key Habitat Attributes & Old Forests

The AB RRA identifies a precautionary evaluation concerning key habitat attributes & old forests in the province.

Key Habitat Attributes

Relating to all ownership types With respect to key habitat attributes, the RRA specifies a requirement for wildlife tree patch (WTP) retention. To address this aspect of the indicator, the BP will incorporate questions into the relevant Forest Feedstock Questionnaire to ask if the forest manager has incorporated WTPs into the harvest plan of the site & what management strategies are implemented with respect to wildlife habitat.

- If the forest manager / supplier provides context in the questionnaire relating to planned WTPs & management for wildlife habitat, the Sustainability Team will consider risk mitigated & approve the fiber source.
- If the forest manager / supplier cannot or does not provide context in the questionnaire relating to planned WTPs & management for wildlife habitat, the Sustainability Team will consider risk specified & reject the fiber source.

Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the management strategies identified in the questionnaire from Phase 1 of the mitigation measure.

Old Forests

The RRA identifies a precautionary specified risk designation as it relates to Old Forest in Alberta due to the lack of targets set by the government for Old Forest distribution on the land base. The government of Alberta has instead incorporated the requirement for forest managers in the province to develop Detailed Forest Management Plans for the licensee's applicable Forest Management Agreement area (FMA). Part of the DFMP is an incorporation of mandatory VOITs (Value, Objective, Indicator, Target) set by government that need to be addressed as defined in the Alberta Forest Management Planning Standard. This document and its annexes comprise the standard for preparing and implementing Forest Management Plans (FMP) in Alberta, requiring a high standard of public involvement and minimum performance standards (VOITs) required for an acceptable FMP in Alberta. As a requirement of the standard, the public involvement process shall describe how decisions will be made in the forest resource. Alberta has sole decision-making authority and strives to ensure that issues raised in the public involvement process are addressed. Old Forests are addressed in the criterion for Biological Diversity in the Planning Standard. Specifically, under Value 1.1.1 (Landscape Scale Biodiversity). Within this objective, licensees are required to develop strategies for the following targets:

- Over the 200-year planning horizon, gross land base greater than x% old forest, greater than y% mature plus old forest, less than z% young forest, & net land base greater than x% old forest, greater than y% mature plus old forest, & less than z% young forest
 - distribution of harvest area sizes that result in a patch over the 200-year planning horizon approximating patterns created by natural disturbances
 - area of old interior forest will not be less than x% of each cover class over the next 200 years
- The targets are not explicitly defined by the government, but rather calculated by the licensee based on the following means to identify the targets:

- sound science
- ecological considerations
- wildlife zones
- disturbance regimes

Targets are required to ensure representation of the natural range of ecosystem attributes. The targets are then vetted with consultation from the public & government prior to government approval of the DFMP. Not setting the percentages in law allows for the revision of the targets at the end of each DFMP validity period & for considerations of natural distribution across various forest management units. FMP indicators are then required to be reported on by the licensee for each FMP within the Stewardship Report. The Alberta Forest Management Planning Standard defines an acceptable variance in percentage of area for each class & subunit.

Relating to Crown Land

To ensure risk is mitigated with respect to Old Forests, the BP will incorporate a review of the relevant licensee's most recent Stewardship Report prior to approval of the fiber source to ensure Old Forest targets are within the acceptable variance range.

- If the BP's review of the Stewardship Report shows Old Forest targets are outside of the acceptable variance, the Sustainability Team will consider risk not mitigated & reject the fiber source
- If the BP's review of the Stewardship Report shows Old Forest targets are within the acceptable variance, the Sustainability Team will consider risk mitigated & approve the fiber source

- If the BP's review of the Stewardship Report cannot verify if targets are within the acceptable variance, the BP will require the supplier to provide documented evidence of the target being within acceptable variance, such as a calculation of seral stage distribution for the FMA.

Relating to Private Land

Within the boundary of each FMA in the province of Alberta, there will be a small component of private lands. Although private land is outside of the scope of forest management obligations of the FMA, the area of forest on private lands is part of the forest mosaic. To mitigate risk with respect to Old Forests, the BP will incorporate a review of the most recent Stewardship Reports for the relevant licensees with forest management obligations for the FMA that the private land unit is located within prior to approval of the fiber source. This review will evidence the management of Old Forest distribution on the greater land base to ensure Old Forest targets are within the acceptable variance range.

- If the BP's review of the Stewardship Report shows Old Forest targets are outside of the acceptable variance, the Sustainability Team will consider risk not mitigated & reject the fiber source
- If the BP's review of the Stewardship Report shows Old Forest targets are within the acceptable variance, the Sustainability Team will consider risk mitigated & approve the fiber source
- If the BP's review of the Stewardship Report cannot verify if targets are within the acceptable variance, the BP will require the supplier to provide documented evidence of the target being within acceptable variance, such as a calculation of seral stage distribution for the FMA.
- Approved fiber sources will be subject to Phase 2 of the monitoring program & will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Education & Outreach

The intent of this mitigation option is to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities. The mitigation measure is part of the FSC's guidance including "Education & Outreach" central theme. All residual fiber suppliers have potential to purchase their raw material from the sub-scopes, thus mitigation efforts are required on all feedstock to ensure the risk is negligible.

All feedstock data in the supply base will be collected via the Forest Feedstock (harvest locations) & Residual Fiber (operating forest areas) Questionnaires, where regional level maps can be created to show where the BP's suppliers sources interact with the specified risk indicators (if applicable in the region). All feedstock suppliers will be required to provide this information prior to receipt of fiber. The final output for this mitigation measure is a "Supplier Mapping Package", which contains detailed information on the interaction between residual suppliers' inferred supply base the specified risk indicators. The supplier mapping package forms the basis of the education and outreach material that will be communicated to residual fiber suppliers on an annual basis.

Note: Overlap with a specified risk polygon does not indicate feedstock must remain as specified risk. Suppliers, and subsequently the BP, can mitigate specified risk overlap by demonstrating how harvesting practices effectively manage for specified risks.

Monitoring and outcomes:

The BP will implement a monitoring program for all forest feedstock sub-scopes procured directly at the pellet mill sites. Monitoring is a method to ensure on the ground activities align with measures that mitigate

specified risks within the supply base area. Monitoring exercise will be carried out on a sample of fields sites throughout the reporting period. The scope of monitoring activities is completed in a multi-stage process.

1. Pre-Delivery / Pre-Contract Signing

Prior to receipt of fiber from any Forest Feedstock (logs or bush grind) source, the BP's Fiber Team will submit an approval request to the Sustainability Team via Survey123. Each sub-scope will have an associated "Forest Feedstock Questionnaire" tailored to specified risk identified in each sub-scope of the risk assessment (RRA or SBE). All versions of the questionnaire will collect spatial information / identification for the origin of the fiber at a harvest unit level. All potential Forest Feedstock sources are to be verified through this process by the Sustainability Team for certification compliance by reviewing the answers provided in the approval request & spatially identifying the applicable management unit in which fiber will be received (Tract, Cutblock, Parcel, etc.). Spatial identification of the harvest unit will be completed by using GIS software. This will include other data & spatial layers from various sources that will confirm the location of the harvest unit (Tract, Cutblock, Parcel, etc.) & its proximity to any specified risk areas identified by the BP.

Note: Overlap with a specified risk polygon does not indicate feedstock must remain as specified risk. Suppliers, and subsequently the BP, can mitigate specified risk overlap by demonstrating how harvesting practices effectively manage for specified risks.

The approval process works in a multi-step verification process to ensure all forest feedstock will meet the BP's requirements.

- Step 1: The Fiber Team representative will pre-screen any potential source of forest feedstock prior to submitting an approval questionnaire, giving a first pass review of the potential fiber source, including a spatial reference to the specified risk identified in the Province / State. Once the Fiber representative screens the potential fiber source, they will have a copy of the applicable Forest Feedstock Questionnaire completed, which is automatically sent into the workflow for Sustainability approval.
- Step 2: The Sustainability Team receives a request for approval via the Microsoft Teams approvals app. The Sustainability Forester or Certification Lead can respond to this request. The Sustainability Team representative will verify:
 - qualitative information relating potential to non-spatial specified risks,
 - spatial information relating to potential overlaps with spatialized specified risks
 - ensure that relevant documentation has been provided by the supplier & Fiber representative, such as maps, shapefiles, harvest plans, & license documents, if applicable to the site
- Once the Sustainability Team finishes this verification & determines that all specified risks relating to the potential fiber source have been addressed, they will approve the questionnaire for pass through to the final stage of the workflow. If specified risk is not addressed, the Sustainability representative will reject the fiber source & the Fiber team will be notified that the source cannot be purchased until specified risk has been mitigated, in which a new approval workflow & questionnaire is required for re-verification.
- Step 3: The Director of Sustainability receives a request for approval on all submissions approved in Step 2 for final verification. In this stage of the workflow, the Director of Sustainability will ensure that all relevant documentation relating to mitigation of potential specified risk has been collected in the previous steps & verify all qualitative answers in the questionnaire.
- After Step 3, the Director of Sustainability can approve or reject the potential fiber source. Approval of the forest feedstock workflow will notify the Fiber Team representative that the source has been accepted by the Sustainability Team as specified risk has been mitigated & procurement of the fiber can occur. If specified risk is not addressed, the Fiber Team will be notified that the source cannot be purchased until

specified risk has been mitigated, in which a new approval workflow & questionnaire is required for reverification. Approved fiber sources in the Forest Feedstock workflow will be considered SBP compliant as all specified risk outlined in the risk assessment have been addressed. The BP is committed to only purchasing forest feedstock from SBP compliant sources, any rejected questionnaires will lead to SBP Controlled sources. The outlined workflow acts as a first, second, and third line of defense approach as it relates to ensure risk mitigation has been completed prior to the purchase of fiber from any Forest Feedstock sources.

2. Post-Delivery

All Forest Feedstock sources are verified through Phase 1 of the Monitoring Forest Feedstock mitigation measure to ensure SBP Compliance can be determined. The focus of Phase 2 of this mitigation measure is field site monitoring a sample of harvest units that fiber was procured from to ensure information received by the supplier (via the Forest Feedstock Questionnaires) in relation to management of specified risk indicators can be observed or corroborated on the ground. The BP will utilize a standard auditing formula to calculate how many samples are to be visited as follows:

$$\text{Sample Size} = \sqrt{(x)} * 0.6$$

Where the sample size is equal to the square root of the number of harvest units where fiber was received from (Timbermark, Opening ID, Tract ID) multiplied by 0.6.

Where possible, photos will be taken to ensure monitoring activity records can be visually documented. All monitoring activities will be documented and recorded for future reference by the BP and for internal and external auditing purposes.

- If the inspection results corroborate the questionnaire, the BP will consider the specified risks mitigated for that feedstock source.
- If the inspection results do not corroborate the questionnaire, the supplier will be subject to the Procurement Policy Mitigation Measure

Procurement Policy

The BP will implement a procurement policy mitigation measure for all sub-scopes. The BP expects that all suppliers contribute to the attainment of information required to carry out mitigation measures. The procurement policy is in place to address suppliers who do not provide the necessary information for the BP to carry out effective mitigation or to address consecutive identifications of non-conformities. Any feedstock from a supplier who either does not provide enough information or is found to have purposefully mislead the BP in questionnaires will be considered SBP controlled feedstock until the proper information can be collected. SBP Compliant or SBP Controlled determinations are made monthly therefore either status will apply for a minimum of one month or until the required information is collected. In cases where information cannot be obtained, or the supplier has demonstrated multiple nonconformities that are unreasonable the BP will:

1. Determine the root cause of the supplier's unwillingness to cooperate
2. Determine if there is a way to obtain information that protects the suppliers' sensitivities but still achieves the BP's information requirements
3. If the supplier and the BP cannot come to a mutual agreement on required information the BP may:
 - a. Determine the feedstock is non-eligible input for SBP products
 - b. Withhold the supplier's deliveries to the BP's facilities

- c. Non-renewal of purchase agreements upon expiry
- d. Termination of the purchase agreement
- e. Removal from consideration on future purchases

The information provided by the processing residue suppliers are reviewed annually and verified by third party auditors to ensure they are complete and correct. The annual information collection and verification exercise reviews the mitigations effectiveness. Any deficiencies are uncovered, and new methodologies are developed to close any uncovered gaps

Effectiveness

Mitigation Measure: Monitoring Forest Feedstock

The biomass producer will maintain records of questionnaires, field site inspection forms, and correspondence with the supplier for each applicable site.

- All non-conformities will be documented by the BP in the onsite inspection form and communicated with the supplier
 - Records of non-conformities will be recorded and documented
1. If a supplier is found to have non-conformities two years in a row, they will be subject to the Procurement Policy Mitigation Measure

Effectiveness will be met by monitoring how suppliers change over time and whether identification of nonconformities lead to changes on the ground.

Mitigation Measure: Education & Outreach

The biomass producer will annually prepare supplier mapping packages for education and outreach activities. The BP will maintain a registrar of all documented conversations with suppliers and follow the below process to measure how the mitigation measure performs over time. The effectiveness monitoring will be included in the BP's Verification & Monitoring process for Supplier Audits.

2. The biomass producer will select a sample of suppliers annually in the Supplier Verification & Monitoring process and review the data contained within the map package during the audit.

Interview Sample Size = $\sqrt{(x)} \times 0.6$

Where X is equal to the number of suppliers that received the map package. Conversations & Interviews with suppliers will be tracked in the BP's communication tracking software to ensure completeness.

The desired outcome of these communications is engaging with the supplier, educating suppliers about the importance of the communication package to the BP's procurement systems, investigating how the supplier used the supplier mapping package, and whether it encourages on the ground changes in the supplier's management approach.

Effectiveness of this process will be reviewed annually and adjusted to ensure the process remains effective for all feedstock supplies originating in the risk assessed area. Once the effectiveness monitoring process has been implemented, the biomass producer can begin to formulate a reasonable assessment as to whether the mitigation measures are effective and if any modifications are required.

Mitigation Measure: Avoidance of High-Risk Feedstock

Mitigation effectiveness for this is measured monthly by the BP confirming that there were no “High Risk feedstock sources that were delivered to the pellet plant.

Mitigation Measure: Procurement Policy

Mitigation effectiveness for this is measured by the BP confirming that any supplier that has been subjected to the policy has not been able to continue delivering fiber unless sufficient documentation has been obtained.

This system is robust, replicable, and reviewed annually and revised if necessary. It requires concerted effort by both Pinnacle and its suppliers and will strengthen over time. In conclusion, the mitigation measure is effective at identifying where all feedstock is sourced back to the concession of harvest. It is also effective at identifying which suppliers are at risk of non-compliance with an HCV area management strategy. The mitigation process identifies which forest management practices are effective at addressing the HCV concern and is communicated to the suppliers. The information provided by the supplier is verified for correctness and completeness during annual review audits.

Country: Canada	
Area/sub-scope: Alberta	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	

In the RRA, a precautionary specified risk designation was applied at the time of writing the risk assessment. To address this indicator, the BP will consider the newer SBP Level A Risk Assessment for EU RED Compliance (REDIII) indicator vi, relevant to the conversion of High Carbon Stocks (wetlands), Peatlands, & Highly Biodiverse Grasslands. Risk of conversion of these values will be considered mitigated by the BP with respect to forestry operations as SBP has identified that these values are sufficiently protected through the current legislative framework & unlikely to be affected. To address the specified risk designation for conversion, the BP will address this with Phase 1 & 2 of the Monitoring Forest Feedstock mitigation measure.

Relating to Public (Crown) Land

In Phase 1 of the mitigation measure, the BP will identify the type of quota or permit for the harvest unit & include questions on reforestation efforts within the Forest Feedstock Questionnaire. For sites identified as part of forestry operations, the BP will consider the evidence from the SBP Level A Risk Assessment that identifies conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands to be negligible risk. In the scenario where the harvest unit is identified as from non-forestry operations, the BP will require a copy of the management plan document that will highlight the forest management strategies for the site.

- Harvest units that originate from forestry operations will be considered low risk by the Sustainability Team & approved
- Harvest units that originate from non-forest operations that do not require reforestation & do not have measures in place relating to the conversion of Forests, Wetlands, Peatlands, or Highly Biodiverse Grasslands will be considered as specified risk & rejected by the Sustainability Team
- Harvest units that originate from non-forest operations that do not require reforestation & have management strategies in place relating to the conversion of Forests, Wetlands, Peatlands, or Highly Biodiverse Grasslands will be considered as low risk & approved by the Sustainability Team

Relating to Private Lands

To address the risk of conversion of forests, the BP will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking:

- if the landowner / supplier is reforesting the harvest unit
- if the landowner / supplier is pulling stumps from the harvest unit

The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure.

- If the site is being reforested, the Sustainability Team will approve the potential fiber source
- If the site is not being reforested, the Sustainability Team will reject the potential fiber source
- If the landowner / supplier is not pulling stumps from the harvest unit, the Sustainability Team will approve the potential fiber source
- If the landowner / supplier is pulling stumps from the harvest unit, the Sustainability Team will follow up with the supplier to ask why
 - o If stumps are being pulled from the harvest unit for forest management / health concerns, the Sustainability Team will collect pictures & evidence to support the forest health concern & approve the potential fiber source
 - o If stumps are being pulled from the harvest unit for reasons other than forest management / health concerns, the Sustainability Team will reject the potential fiber source

As it relates to the conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands on private land, the BP will consider the evidence from the SBP Level A Risk Assessment that identifies conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands to be negligible risk.

Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada

Area/sub-scope: Alberta - Private Land

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:

2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.

Description of the specific risk:

See SBP Regional Risk Assessment for Alberta for summary of specified risks.

Mitigation measure:

See associated mitigation measures for the referenced indicators with specified risk designations (2.2.3 – Soil Quality Maintained or Enhanced; 2.2.9 – Long-term Production Capacity; and 2.2.10 – Regen After Harvest).

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada	
Area/sub-scope: Alberta - Private Land	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for soil quality in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being managed with respect to soil quality, the Sustainability Team will approve the potential fiber source - If the site is not being managed with respect to soil quality, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: Alberta - Private Land	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The BP will consider indicators relating to reforestation & forest conversion of the site as a measure of control to address long term production capacity of the forest landscape. Please see the mitigation measures relating to indicator 2.2.1 & 2.2.10 for reference to how the BP will mitigate this risk.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: Alberta - Private Land	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for regeneration in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being reforested (via planting or natural regeneration) or there is evidence to support the site being satisfactorily restocked, the Sustainability Team will approve the potential fiber source - If the site is not being reforested - or there is evidence of conversion to non-forest, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: Alberta - Private Land	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
In the context of low productive sites, the province of Alberta does not have public data relating to site productivity on private lands. Relating to areas that are difficult to regenerate, the province of Alberta has a spatial inventory of wetlands through the Alberta Biodiversity Monitoring Institute (ABMI). The BP will consider wetlands in the province of Alberta as the equivalency of areas that are difficult to regenerate. Using the dataset for wetlands & the Forest Feedstock Questionnaire to identify any non-registered wetlands in the database, the BP will avoid any feedstock sources that include the harvest of biomass from wetlands. - If the harvested area of the harvest unit does not overlap or is not within 10m of identified wetlands, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source - If the harvested area of the harvest unit overlaps or is within 10m of identified wetlands, the Sustainability Team will consider the site as specified risk & reject the potential fiber source - The BP will not consider justification from the supplier that includes harvesting of these polygons as sufficient evidence for mitigation risk - Approved fiber sources will be subject to Phase 2 of the monitoring program & will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada
Area/sub-scope: Alberta
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The AB RRA identifies Forest Feedstock originating from areas of combined attributes of High Conservation Value & High Carbon Stock as a Specified Risk as it relates to all ownership types. In the RRA, a precautionary specified risk designation was applied at the time of writing the risk assessment. To address this indicator, the BP will consider the newer SBP Level A Risk Assessment for EU RED Compliance (REDIII) indicator vi(5), relevant to the conversion of High Carbon Stocks. The REDIII Level A Risk Assessment classifies High Carbon Stocks in the province to be equivalent to wetlands & peatlands. These are areas with significant levels of above & below ground carbon & other key biodiversity attributes. With conversion of High Carbon Stocks (wetlands) in the province of Alberta being protected through rigorous legislative frameworks, the BP will consider the precautionary specified risk to be mitigated if mitigation of risk to High Conservation Values is achieved. The context of this indicator requires the rejection of fiber to the biomass industry if it originates from forests that have overlapping HCS & HCV present. Through the EU RED risk assessment, SBP has identified that HCS are sufficiently protected through the current legislative framework & unlikely to be affected by forestry operations. High Conservation Values (HCVs) have been identified in indicator 2.1.3, being Landscape Level SAR (Caribou), Intact Forest Landscapes, Local SAR, & Key Habitat Attributes / Old Forests. See indicator 2.1.3 for the associated mitigation measures for specified risk identified in Alberta.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: Alberta	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The BP will address this indicator in the applicable Forest Feedstock Questionnaire with review in Phase 1 of the Monitoring Forest Feedstock mitigation measure. The BP will implement the requirements of the Sustainable Forestry Initiative's Fiber Sourcing Standard. These requirements ensure that the BP sources fiber from qualified loggers, with the BP providing training material to the supplier that focuses on Safety, Biodiversity (Forests with Exceptional Conservation Value), SFI requirements, & Best Management Practices. Once training is completed by the supplier, they receive a digital certificate of completion. The BP will request this certificate as evidence of training completed. Once the Sustainability Team receives this certificate as evidence of training completed, they will approve the potential fiber source - If the supplier does not / cannot provide evidence of training in the form of a completion certificate, the Sustainability Team will reject the potential fiber source.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada

Area/sub-scope: Alberta - Private Land	
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:	
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	
Description of the specific risk:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The BP will address this indicator in the applicable Forest Feedstock Questionnaire with review in Phase 1 of the Monitoring Forest Feedstock mitigation measure. The BP will implement the requirements of the Sustainable Forestry Initiative's Fiber Sourcing Standard. These requirements ensure that the BP sources fiber from qualified loggers, with the BP providing training material to the supplier that focuses on Safety, Biodiversity (Forests with Exceptional Conservation Value), SFI requirements, & Best Management Practices. Once training is completed by the supplier, they receive a digital certificate of completion. The BP will request this certificate as evidence of training completed. Once the Sustainability Team receives this certificate as evidence of training completed, they will approve the potential fiber source - If the supplier does not / cannot provide evidence of training in the form of a completion certificate, the Sustainability Team will reject the potential fiber source.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada
Area/sub-scope: Alberta - Private Land
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The RRA working body equates conformance with this indicator to a bucket of other values. See associated mitigation measures for the referenced indicators with specified risk designations (2.1.3 - Biodiversity, 2.2.1 - Conversion, 2.2.2 - Ecosystem Health / Vitality, 2.2.3 - Soil Quality, 2.2.5 - Water Quality, 4.1.10 - Worker Safety, 4.2.3 - Food / Water Supply, 4.2.4 - Use Rights, & 4.2.6 - Consultation)	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: Alberta	
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:	
4.2.4 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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
Relating to crown land in Alberta, specified risk was designated because the province does not have the legislative equivalency to DRIPA (which was used as evidence for low risk in British Columbia's RRA) or publicly available reports of consultation. In the absence of this specific legislative piece, the BP has assessed the risk potential of harvest operations on Crown land to be considered not respecting the values of Indicator 4.2.4. The Government of Alberta requires companies to complete a rigid First Nations consultation process for development on Crown land. Part of this consultation is information sharing between the operator & First Nations in the area of planned operations, with the Government of Alberta's regulatory body granting approval that the consultation was adequate prior to operations commencing . This consultation process is applicable to a wide range of developments, including Oil Sands, conventional Oil & Gas, Pipelines, Mining, Forestry, Parklands, Public Infrastructure, & Flood Recovery / Mitigation. The contents of assessment & approval of adequacy of development projects are highly confidential between the First Nation, operator, & regulatory body. Although confidential, the BP can assess there is a low risk for 4.2.4 to be impacted by forestry operations as harvesting cannot occur on Crown land in the Province of Alberta if adequacy has not been granted. Adequacy approval from the Government of Alberta shows due process for operators on Crown land to have identified, documented, & respected the legal, customary, & traditional tenure / use rights of Indigenous Peoples and local communities. In addition to the BP's assessment on the approval of forestry operations on Crown land in Alberta, the RRA working group has also assigned there to be low risk relating to Indicator 4.2.6 (Consultation & Accommodation) on Crown land. The context of this indicator is not applicable to the Private Land sub-scope that had specified risk assigned to it. The following rationale will be used by the BP to justify negligible (low) risk: For the risk assessment, the RRA working body establishes the following as it relates to Private Land: - Indicator 1.1.1 (Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations) is low risk - Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk - Indicator 1.1.3 (Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements) is low risk - Indicator 1.1.4 (Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date) is low risk - Indicator 1.1.5 (There shall be adequate protection of the Supply Base from unauthorized and illegal	

activities, such as illegal logging, mining, and encroachment) is low risk
 - Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk

Within the context of Indicator 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) the RRA working body also establishes that Indigenous Peoples have not asserted tenure and use rights on private land. If there are currently no use rights asserted within the sub-scope, there should not be a risk associated with infringing on use rights relating to private land. In the future, if there were to be use rights asserted on private lands, the RRA working body has established through the following indicators:

- Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk, and
- Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk

With the pieces of evidence listed above, the BP will consider risk for this indicator to be mitigated.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada

Area/sub-scope: Alberta - Private Land

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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The context of this indicator is not applicable to the sub-scopes (PMFL & Other Private Lands) that had specified risk assigned to them. The following rationale will be used by the BP to justify negligible (low) risk: For the risk assessment, the RRA working body establishes the following as it relates to Private Land: - Indicator 1.1.1 (Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations) is low risk - Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk - Indicator 1.1.3 (Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements) is low risk - Indicator 1.1.4 (Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date) is low risk - Indicator 1.1.5 (There shall be adequate protection of the Supply Base from unauthorized and illegal activities, such as illegal logging, mining, and encroachment) is low risk - Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk Within the context of Indicator 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) the RRA working body also establishes that Indigenous Peoples have not asserted tenure and use rights on private managed forest land and other private land. If there are currently no use rights asserted within sub-scope, there should not be a risk associated with infringing on use rights relating to private land. In the future, if there were to be use rights asserted on private lands, the RRA working body has established through the following indicators: - Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk, and - Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk With the pieces of evidence listed above, the BP will consider risk for this indicator to be mitigated.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: Alberta - Private Land	
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:	
See SBP Regional Risk Assessment for Alberta for summary of specified risks.	
Mitigation measure:	
The specified risk in Alberta was designated as there isn't a publicly available listing for designated heritage sites on private lands. Although this list is not available publicly, landowners in the Province of Alberta are notified by the government if their property is potentially or formally designated as a historic resource. To address this risk, the BP will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: if the landowner has been notified that their property contains a historic resource feature The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being managed with respect to heritage features or if the landowner has not been informed of any designated heritage resource on their land, the Sustainability Team will approve the potential fiber source - If the landowner has been notified of the presence of a heritage feature on their property & harvesting is not being managed with respect to heritage features, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the management strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada
Area/sub-scope: British Columbia

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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
Context - Forest Feedstock Deliveries Prior to receipt of fiber from any Forest Feedstock (logs or bush grind) source, the Fiber Team will submit an approval request to the Sustainability Team via Survey123. Each sub-scope will have an associated "Forest Feedstock Questionnaire" tailored to specified risk identified in each sub-scope of the risk assessment. All versions of the questionnaire will collect spatial information for the origin of the fiber at a harvest unit level. All potential Forest Feedstock sources are to be verified through this process by the Sustainability Team for certification compliance by reviewing the answers provided in the approval request & spatially identifying the applicable management unit in which fiber will be received (Tract, Cutblock, Parcel, etc.). Spatial identification of the harvest unit will be completed by using GIS software. This will include other data & spatial layers from various sources that will confirm the location of the harvest unit (Tract, Cutblock, Parcel, etc.) & its proximity to any specified risk areas identified by the BP. - If the BP deems that the specified risks outlined in the risk assessment are being satisfactorily addressed, the feedstock will be considered SBP compliant & purchase of the fiber will proceed. - If the BP deems that the specified risks outlined in the risk assessment are not being satisfactorily addressed, the feedstock will be considered SBP controlled & purchase of the fiber will not proceed. Context - Residual Fiber Deliveries Prior to receipt of fiber from any Residual Fiber (processing residues & tertiary feedstock) source, the Fiber Team will submit an approval request to the Sustainability Team via Survey123. Every supplier will be required to complete a "Residual Fiber Questionnaire" tailored to specified risk identified in each sub-scope of the risk assessment. All versions of the questionnaire will collect spatial information for the supplier's supply base at a sourcing area / county level. This questionnaire will be required by the BP to be filled out on an annual basis to ensure data is accurate & up to date. Spatial identification of the supplier's supply	

base will be completed by using GIS software. This will include other data & spatial layers from various sources that will confirm the location of the supply base & its proximity to any specified risk areas identified by the BP. The assessment of this indicator identifies specified risk as it relates to four values of key ecosystems & High Conservation Values, all of which will be addressed by verification of the spatial location of the harvest unit in relation to data available to the BP for each of the values. To address the identified specified risk, the BP will implement a Monitoring Forest Feedstock mitigation measure for Forest Feedstock sources, with an Education & Outreach approach for Residual Fiber sources.

Monitoring Forest Feedstock & Avoidance of High Risk Feedstock:

Landscape Level Species at Risk (Caribou)

To address Caribou values, the BP will use the BC Government's Data Centre layer relating to Ungulate Winter Ranges for caribou as the measure for caribou habitat values. This dataset is defined as an area that contains habitat that is necessary to meet the winter habitat requirements of an ungulate species. UWR are based on our current understanding of ungulate habitat requirements in winter, as interpreted by the Ministry of Environment (MOE) regional staff from current scientific and management literature, local knowledge, and other expertise from the region. To incorporate a wider range of area where caribou could be affected by harvesting operations, the BP will consider both approved & proposed UWR polygons when reviewing potential fiber sources / harvest units.

In Phase 1 of the Monitoring Forest Feedstock mitigation measure, the BP will check to see if the proposed harvest unit is either overlapping or adjacent to the UWR polygons. If overlapping or adjacent to the UWR polygons, the BP will request evidence from the supplier to show that caribou values are being managed for in relation to the harvesting of these sites. Intact Forest Landscapes

Intact Forest Landscapes (IFLs) are defined by Global Forest Watch as areas of forest cover which contains forest and non-forest ecosystems minimally influenced by human economic activity, with an area of at least 500 km² (50,000 ha) and a minimal width of 10 km (measured as the diameter of a circle that is entirely inscribed within the boundaries of the territory). Within the FSC National Risk Assessment for Canada, IFLs have been spatially identified. The BP will consider this data from the FSC NRA to assess spatially where potential harvest units interact with the IFLs.

The term IFL is not officially recognized by the British Columbia government in its forest management legislation. Although the term is not recognized, the legislation in place (Forest & Range Practices Act, as well as the Forest Planning & Practices Regulation) identify targets & requirements for landscape level objectives relating to biodiversity & forest cover management. In these legislated requirements on Public (Crown) land, is a requirement for licensees to manage patch size distribution of harvest units & seral stage percentage distribution across Biogeoclimatic Zones in the province. The BP will also consider this legislation in the assessment of risk to Intact Forest Landscapes.

Relating to Public (Crown) Land:

The BP will assess the potential for each IFL in British Columbia to be reduced below the threshold of 50,000 ha based on the Timber Harvesting Land Base (THLB). If more than 50,000 ha of the IFL is located outside of the THLB, the BP will consider the IFL to be low risk for harvest to impact the large level landscape HCV. If less than 50,000 ha of an IFL is located outside of the THLB, the BP will consider the IFL as having Specified Risk potential.

For IFLs with Specified Risk potential, the BP will include a spatial review of proposed harvest units in

Phase 1 of the Monitoring Forest Feedstock mitigation measure. If overlap is present, the BP will request documented evidence of the supplier's analysis of seral stage distribution targets as required by legislation are being met.

- If there is no overlap with the IFL layer, the Sustainability Team will approve the source as low risk;
- If there is overlap with the IFL layer & the supplier provides evidence to show the landscape level objectives are being met, the Sustainability Team will approve the fiber source as low risk;
- If there is overlap with the IFL layer & the supplier cannot provide evidence of this, or targets are not being met after reviewing the evidence, the Sustainability team will reject the harvest unit as a potential fiber source as specified risk is not being mitigated.

Relating to Private Managed Forests & Other Private Land:

The BP will assess the potential for each IFL in British Columbia to be reduced below the threshold of 50,000 ha based on the government's parcel data for identifying Private & Federal lands. If more than 50,000 ha of the IFL is located outside of private / federal land, the BP will consider the IFL to be low risk for harvest to impact the large level landscape HCV. If more than 50,000 ha of an IFL is located inside of private / federal land, the BP will consider the IFL as having Specified Risk potential.

For IFLs with Specified Risk potential, the BP will include a spatial review of proposed harvest units in Phase 1 of the Monitoring Forest Feedstock mitigation measure. If overlap is present, the BP will request documented evidence of the supplier's analysis of seral stage distribution targets as required by legislation are being met.

- If there is no overlap with the IFL layer, the Sustainability Team will approve the source as low risk;
- If there is overlap with the IFL layer & the supplier provides evidence to show the landscape level objectives are being met, the Sustainability Team will approve the fiber source as low risk;
- If there is overlap with the IFL layer & the supplier cannot provide evidence of this, or targets are not being met after reviewing the evidence, the Sustainability team will reject the harvest unit as a potential fiber source as specified risk is not being mitigated.

Local & Endemic Species at Risk

The BC RRA identifies extensive legislation relating to Species at Risk in the province, with the BC Data Centre (BCCDC) as a source of information on listed species at risk in the supply base. Specified Risk was a precautionary evaluation concerning the monitoring aspect of forest management practices. To bridge the gap identified in the RRA, the BP will utilize both public & private data sources to identify spatial locations of habitat relating to red listed species in the province & assess the potential for these sites to overlap with harvest units. Both the BCCDC list of Species at Risk (public) & the Integrated Biodiversity Assessment Tool (IBAT) (private). The Integrated Biodiversity Assessment Tool (IBAT) is an Alliance between BirdLife International, United Nations Environment Programme - World Conservation Monitoring Centre, The International Union for Conservation of Nature (IUCN) and Conservation International. IBAT is a biodiversity data provider licensing commercial access to global biodiversity datasets and derived data layers including the IUCN Red List of Threatened Species™, the World Database on Protected Areas (WDPA) and the World Database of Key Biodiversity Areas (WDKBA)

To mitigate the risk on Local SAR, the BP will cross reference the provincial list of Species at Risk with a Red List label with the data available in the province from IBAT to identify species to focus on for monitoring exercises.

Relating to Public (Crown) Land

This data will be used in Phase 1 of the Monitoring Forest Feedstock mitigation measure by including a

spatial reference to the proposed harvest unit. If the harvest unit overlaps with data from the Species at Risk layer, the BP will request documented evidence of management for Species at Risk relating to the forest management of the site.

- If the supplier provides sufficient evidence that mitigates risk of impact to referenced species, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
- If the supplier cannot provide sufficient evidence that mitigates risk of impact to referenced species, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the Species at Risk layer, the site will be considered low risk & the Sustainability Team will approve the potential fiber source
- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites that overlap with the Species at Risk layer will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Relating to Private Managed Forests & Other Private Land

This data will be used in Phase 1 of the Monitoring Forest Feedstock mitigation measure by including a spatial reference to the proposed harvest unit. If the harvest unit overlaps with data from the Species at Risk layer, the BP will request documented evidence of management for Species at Risk relating to the forest management of the site. In addition to the spatial reference, the BP will include questions in the applicable Forest Feedstock Questionnaire for landowners / suppliers of fiber from private land types to identify management strategies used to address Species at Risk

- If the supplier provides sufficient evidence that mitigates risk of impact to referenced species in the applicable Forest Feedstock Questionnaire, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
- If the supplier cannot provide sufficient evidence that mitigates risk of impact to referenced species in the applicable Forest Feedstock Questionnaire, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the Species at Risk layer, the site will be considered low risk & the Sustainability Team will approve the potential fiber source
- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites that overlap with the Species at Risk layer will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Key Habitat Attributes & Old Growth Forests

The BC RRA identifies a precautionary evaluation concerning key habitat attributes & old growth forests in the province.

Relating to all ownership types

Key Habitat Attributes

With respect to key habitat attributes, the RRA specifies a requirement for wildlife tree patch (WTP) retention. To address this aspect of the indicator, the BP will incorporate questions into the relevant Forest Feedstock Questionnaire to ask if the forest manager has incorporated WTPs into the harvest plan of the site & what management strategies are implemented with respect to wildlife habitat. If the forest manager / supplier provides context in the questionnaire relating to planned WTPs & management for wildlife habitat, the Sustainability Team will consider risk mitigated & approve the fiber source.

- If the forest manager / supplier cannot or does not provide context in the questionnaire relating to planned WTPs & management for wildlife habitat, the Sustainability Team will consider risk specified & reject the fiber source.

Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the management strategies identified in the questionnaire from Phase 1 of the mitigation measure

Old Growth Forests

The BP has a company Old Growth policy relating to Forest Feedstock in British Columbia. Mitigation strategies for this indicator will follow this document as follows:

- If the harvested area of the harvest unit (timbermark or parcel) does not overlap or is not within 10m of either the OGMA or OGDA layers, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
- If the harvested area of the harvest unit (timbermark or parcel) does overlap or is within 10m of either the OGMA or OGDA layers, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- The BP will not consider justification from the supplier that includes harvesting of these polygons as sufficient evidence for mitigation risk
- Approved fiber sources will be subject to Phase 2 of the monitoring program & will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Education & Outreach

The intent of this mitigation option is to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities. The mitigation measure is part of the FSC's guidance including "Education & Outreach" central theme. All residual fiber suppliers have potential to purchase their raw material from the sub-scopes, thus mitigation efforts are required on all feedstock to ensure the risk is negligible.

All feedstock data in the supply base will be collected via the Forest Feedstock (harvest locations) & Residual Fiber (operating forest areas) Questionnaires, where regional level maps can be created to show where the BP's suppliers sources interact with the specified risk indicators (if applicable in the region). All feedstock suppliers will be required to provide this information prior to receipt of fiber. The final output for this mitigation measure is a "Supplier Mapping Package", which contains detailed information on the interaction between residual suppliers' inferred supply base the specified risk indicators. The supplier mapping package forms the basis of the education and outreach material that will be communicated to residual fiber suppliers on an annual basis.

Note: Overlap with a specified risk polygon does not indicate feedstock must remain as specified risk. Suppliers, and subsequently the BP, can mitigate specified risk overlap by demonstrating how harvesting practices effectively manage for specified risks.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada	
Area/sub-scope: British Columbia	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
In the RRA, a precautionary specified risk designation was applied at the time of writing the risk assessment. To address this indicator, the BP will consider the newer SBP Level A Risk Assessment for EU RED Compliance (REDIII) indicator vi, relevant to the conversion of High Carbon Stocks (wetlands), Peatlands, & Highly Biodiverse Grasslands. Risk of conversion of these values will be considered mitigated by the BP with respect to forestry operations as SBP has identified that these values are sufficiently protected through the current legislative framework & unlikely to be affected. To address the specified risk designation for conversion, the BP will address this with Phase 1 & 2 of the Monitoring Forest Feedstock mitigation measure. Relating to Public (Crown) Land In Phase 1 of the mitigation measure, the BP will spatially the harvest unit by tenure type & scope of applicability as it relates to forestry or non-forestry operations as follows: - Forest License - Woodlot - Community Forest - License to Cut Once identified, the BP will consider the legislation in place that dictates requirements & monitoring for reforestation. Harvest units that are within a Forest License, Woodlot, or Community Forest are all within the scope of forestry operations & are required by law to manage for these values. For these sites, the BP will	

consider the evidence from the SBP Level A Risk Assessment that identifies conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands to be negligible risk. Harvest units identified in a License to Cut have the potential to originate from agricultural land, mine sites, or oil & gas projects. In the scenario where the harvest unit is identified as a License to Cut, the BP will require a copy of the license document that will highlight the forest management strategies for the site or the original cutting permit that the License to Cut is relevant to.

- Harvest units that originate from forestry operations (Forest Licenses, Woodlots, or Community Forests) will be considered low risk by the Sustainability Team & approved
- Harvest units that originate from non-forest operations that do not require reforestation & do not have measures in place relating to the conversion of Forests, Wetlands, Peatlands, or Highly Biodiverse Grasslands will be considered as specified risk & rejected by the Sustainability Team
- Harvest units that originate from non-forest operations that do not require reforestation & have management strategies in place relating to the conversion of Forests, Wetlands, Peatlands, or Highly Biodiverse Grasslands will be considered as low risk & approved by the Sustainability Team

Relating to Private Lands

To address the risk of conversion of forests, the BP will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking:

- if the landowner / supplier is reforesting the harvest unit
- if the landowner / supplier is pulling stumps from the harvest unit

The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure.

- If the site is being reforested, the Sustainability Team will approve the potential fiber source
- If the site is not being reforested, the Sustainability Team will reject the potential fiber source
- If the landowner / supplier is not pulling stumps from the harvest unit, the Sustainability Team will approve the potential fiber source
- If the landowner / supplier is pulling stumps from the harvest unit, the Sustainability Team will follow up with the supplier to ask why
 - o If stumps are being pulled from the harvest unit for forest management / health concerns, the Sustainability Team will collect pictures & evidence to support the forest health concern & approve the potential fiber source
 - o If stumps are being pulled from the harvest unit for reasons other than forest management / health concerns, the Sustainability Team will reject the potential fiber source

As it relates to the conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands on private land, the BP will consider the evidence from the SBP Level A Risk Assessment that identifies conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands to be negligible risk. To ensure the management of water as it relates to Wetlands & Peatlands, see associated mitigation measures for indicator 2.2.5 (Water Quality & Quantity).

Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
See associated mitigation measures for the referenced indicators with specified risk designations (2.2.3 – Soil Quality Maintained or Enhanced; Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; 2.2.9 – Long-term Production Capacity, and 2.2.10 – Regen After Harvest).	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for soil quality in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being managed with respect to soil quality, the Sustainability Team will approve the potential fiber source - If the site is not being managed with respect to soil quality, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for water quality in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being managed with respect to water quality, the Sustainability Team will approve the potential fiber source - If the site is not being managed with respect to water quality, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
The BP will consider indicators relating to reforestation & forest conversion of the site as a measure of control to address long term production capacity of the forest landscape. Please see the mitigation measures relating to indicator 2.2.1 & 2.2.10 for reference to how the BP will mitigate this risk.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for regeneration in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being reforested (via planting or natural regeneration) or there is evidence to support the site being satisfactorily restocked, the Sustainability Team will approve the potential fiber source - If the site is not being reforested - or there is evidence of conversion to non-forest, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
The BC RRA identifies Forest Feedstock originating from areas of combined attributes of High Conservation Value & High Carbon Stock as a Specified Risk as it relates to all ownership types. In the RRA, a precautionary specified risk designation was applied at the time of writing the risk assessment. To address this indicator, the BP will consider the newer SBP Level A Risk Assessment for EU RED Compliance (REDIII) indicator vi(5), relevant to the conversion of High Carbon Stocks. The REDIII Level A Risk Assessment classifies High Carbon Stocks in the province to be equivalent to wetlands & peatlands. These are areas with significant levels of above & below ground carbon & other key biodiversity attributes. With conversion of High Carbon Stocks (wetlands) in the province of British Columbia being protected through rigorous legislative frameworks, the BP will consider the precautionary specified risk to be mitigated if mitigation of risk to High Conservation Values is achieved. The context of this indicator requires the rejection of fiber to the biomass industry if it originates from forests that have overlapping HCS & HCV present. Through the EU RED risk assessment, SBP has identified that HCS are sufficiently protected through the current legislative framework & unlikely to be affected by forestry operations. High Conservation Values (HCVs) have been identified in indicator 2.1.3, being Landscape Level SAR (Caribou), Intact Forest Landscapes, Local SAR, & Key Habitat Attributes / Old Growth. See indicator 2.1.3 for the associated mitigation measures for specified risk identified in British Columbia.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	
Description of the specific risk:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
The BP will address this indicator in the applicable Forest Feedstock Questionnaire with review in Phase 1 of the Monitoring Forest Feedstock mitigation measure. The BP will implement the requirements of the Sustainable Forestry Initiative's Fiber Sourcing Standard. These requirements ensure that the BP sources fiber from qualified loggers, with the BP providing training material to the supplier that focuses on Safety, Biodiversity (Forests with Exceptional Conservation Value), SFI requirements, & Best Management Practices. Once training is completed by the supplier, they receive a digital certificate of completion. The BP will request this certificate as evidence of training completed. Once the Sustainability Team receives this certificate as evidence of training completed, they will approve the potential fiber source - If the supplier does not / cannot provide evidence of training in the form of a completion certificate, the Sustainability Team will reject the potential fiber source.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scopes 2 & 3	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
The RRA working body equates conformance with this indicator to a bucket of other values. See associated mitigation measures for the referenced indicators with specified risk designations (2.1.3 - Biodiversity, 2.2.1 - Conversion, 2.2.2 - Ecosystem Health / Vitality, 2.2.3 - Soil Quality, 2.2.5 - Water Quality, 4.1.10 - Worker Safety, 4.2.3 - Food / Water Supply, 4.2.4 - Use Rights, & 4.2.6 - Consultation)	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
4.2.3 Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced	
Description of the specific risk:	

See SBP Regional Risk Assessment for British Columbia for summary of specified risks.
Mitigation measure:
The RRA working body associates risk in this indicator with the management of drinking water sources. See associated mitigation measures for the referenced indicator with specified risk designations (Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced).
Monitoring and outcomes:
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada
Area/sub-scope: British Columbia - Sub-Scopes 2 & 3
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:
4.2.4 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:
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.
Mitigation measure:
The context of this indicator is not applicable to the sub-scopes (PMFL & Other Private Lands) that had specified risk assigned to them. The following rationale will be used by the BP to justify negligible (low) risk: For the risk assessment, the RRA working body establishes the following as it relates to PMFL & Other Private Land: - Indicator 1.1.1 (Operations related to feedstock sourcing and biomass production shall comply with all

existing applicable laws and regulations) is low risk

- Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk
- Indicator 1.1.3 (Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements) is low risk
- Indicator 1.1.4 (Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date) is low risk
- Indicator 1.1.5 (There shall be adequate protection of the Supply Base from unauthorized and illegal activities, such as illegal logging, mining, and encroachment) is low risk
- Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk

Within the context of Indicator 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) the RRA working body also establishes that Indigenous Peoples have not asserted tenure and use rights on private managed forest land and other private land. If there are currently no use rights asserted within the two sub-scopes, there should not be a risk associated with infringing on use rights relating to private land. In the future, if there were to be use rights asserted on private lands, the RRA working body has established through the following indicators:

- Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk, and
- Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk

With the pieces of evidence listed above, the BP will consider risk for this indicator to be mitigated.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: Canada

Area/sub-scope: British Columbia - Sub-Scopes 2 & 3

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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
The context of this indicator is not applicable to the sub-scopes (PMFL & Other Private Lands) that had specified risk assigned to them. The following rationale will be used by the BP to justify negligible (low) risk: For the risk assessment, the RRA working body establishes the following as it relates to PMFL & Other Private Land: - Indicator 1.1.1 (Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations) is low risk - Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk - Indicator 1.1.3 (Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements) is low risk - Indicator 1.1.4 (Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date) is low risk - Indicator 1.1.5 (There shall be adequate protection of the Supply Base from unauthorized and illegal activities, such as illegal logging, mining, and encroachment) is low risk - Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk Within the context of Indicator 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) the RRA working body also establishes that Indigenous Peoples have not asserted tenure and use rights on private managed forest land and other private land. If there are currently no use rights asserted within the two sub-scopes, there should not be a risk associated with infringing on use rights relating to private land. In the future, if there were to be use rights asserted on private lands, the RRA working body has established through the following indicators: - Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk, and - Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk With the pieces of evidence listed above, the BP will consider risk for this indicator to be mitigated.	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: Canada	
Area/sub-scope: British Columbia - Sub-Scope 3	
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:	
See SBP Regional Risk Assessment for British Columbia for summary of specified risks.	
Mitigation measure:	
In the Sustainable Biomass Program's guidance documentation for this indicator, a threshold of the bottom 10% of site productivity can be used as a control measure. To address this, the BP will utilize the Vegetative Resource Inventory (VRI) dataset from the British Columbia government to find areas that are in the bottom 10% of Site Index & check applicable harvest units for overlap with these areas. - If the harvested area of the harvest unit does not overlap or is not within 10m of this layer, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source - If the harvested area of the harvest unit overlaps or is within 10m of this layer, the Sustainability Team will consider the site as specified risk & reject the potential fiber source - The BP will not consider justification from the supplier that includes harvesting of these polygons as sufficient evidence for mitigation risk - Approved fiber sources will be subject to Phase 2 of the monitoring program & will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: United States	
Area/sub-scope: PNW - State & Private Forest	
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:	
Federal lands are well protected against conversion of all types, both by overarching policies and by specific management plans for each forest unit and region. On private lands, conversion of wetlands and peatlands is strongly limited by the Clean Water Act, and conversion of grasslands to forestland is not a common occurrence. However, conversion of private forestland to other uses is relatively common.	
Mitigation measure:	
Relating to State Land In Phase 1 of the mitigation measure, the BP will identify the type of quota or permit for the harvest unit & include questions on reforestation efforts within the Forest Feedstock Questionnaire. For sites identified as part of forestry operations, the BP will consider the conversion of Wetlands, Peatlands, & Highly Biodiverse Grasslands to be negligible risk. In the scenario where the harvest unit is identified as from non-forestry operations, the BP will require a copy of the management plan document that will highlight the forest management strategies for the site. - Harvest units that originate from forestry operations will be considered low risk by the Sustainability Team & approved - Harvest units that originate from non-forest operations that do not require reforestation & do not have measures in place relating to the conversion of Forests, Wetlands, Peatlands, or Highly Biodiverse Grasslands will be considered as specified risk & rejected by the Sustainability Team - Harvest units that originate from non-forest operations that do not require reforestation & have management strategies in place relating to the conversion of Forests, Wetlands, Peatlands, or Highly Biodiverse Grasslands will be considered as low risk & approved by the Sustainability Team Relating to Private Lands	

To address the risk of conversion of forests, the BP will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking:

- if the landowner / supplier is reforesting the harvest unit
- if the landowner / supplier is pulling stumps from the harvest unit

The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure.

- If the site is being reforested, the Sustainability Team will approve the potential fiber source
- If the site is not being reforested, the Sustainability Team will reject the potential fiber source
- If the landowner / supplier is not pulling stumps from the harvest unit, the Sustainability Team will approve the potential fiber source
- If the landowner / supplier is pulling stumps from the harvest unit, the Sustainability Team will follow up with the supplier to ask why
 - o If stumps are being pulled from the harvest unit for forest management / health concerns, the Sustainability Team will collect pictures & evidence to support the forest health concern & approve the potential fiber source
 - o If stumps are being pulled from the harvest unit for reasons other than forest management / health concerns, the Sustainability Team will reject the potential fiber source

Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: United States

Area/sub-scope: Wyoming - Private Lands

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:	
Soil quality is maintained or protected by federal and state regulations which are enforced by multiple regulatory agencies. Forest activities on federal lands are assessed under NEPA and follow various management plans. State and private activities follow state-level forest practices regulations or recommended BMPs. Operations on private lands on Wyoming, however, are not legally required to comply with BMPs, and limited data exists on the extent of active compliance.	
Mitigation measure:	
Monitoring Feedstock Sources & Avoidance of High Risk - Forest Feedstock Suppliers To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for soil quality in forest management operations - does the supplier utilize State BMPs The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being managed with respect to soil quality, the Sustainability Team will approve the potential fiber source - If the site is not being managed with respect to soil quality, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure. Education & Outreach - Processing Residue & Tertiary Feedstock Suppliers The intent of this mitigation option is to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities. The mitigation measure is part of the FSC's guidance including "Education & Outreach" central theme. All residual fiber suppliers have potential to purchase their raw material from the sub-scopes, thus mitigation efforts are required on all feedstock to ensure the risk is negligible. All feedstock data in the supply base will be collected via the Forest Feedstock (harvest locations) & Residual Fiber (operating forest areas) Questionnaires, where regional level maps can be created to show where the BP's suppliers sources interact with the specified risk indicators (if applicable in the region). All feedstock suppliers will be required to provide this information prior to receipt of fiber. The final output for this mitigation measure is a "Supplier Mapping Package", which contains detailed information on the interaction between residual suppliers' inferred supply base the specified risk indicators. The supplier mapping package forms the basis of the education and outreach material that will be communicated to residual fiber suppliers on an annual basis. Note: Overlap with a specified risk polygon does not indicate feedstock must remain as specified risk. Suppliers, and subsequently the BP, can mitigate specified risk overlap by demonstrating how harvesting	

practices effectively manage for specified risks.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: United States

Area/sub-scope: Wyoming - Private Lands

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:

Unmanaged slash can contribute to catastrophic wildfires. Therefore, laws have been passed which require slash management for wildfire mitigation on state and federal lands. The same is true on private lands, except for those in Wyoming.

Mitigation measure:

Monitoring Feedstock Sources & Avoidance of High Risk - Forest Feedstock Suppliers

To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking:

- if & how the supplier is implementing management strategies for harvest residue & wildfire mitigation management in forest management operations

The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure.

- If the site is being managed with respect to harvest residues & wildfire mitigation, the Sustainability

Team will approve the potential fiber source

- If the site is not being managed with respect to harvest residues & wildfire mitigation, the Sustainability Team will reject the potential fiber source
- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure.

Education & Outreach - Processing Residue & Tertiary Feedstock Suppliers

The intent of this mitigation option is to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities. The mitigation measure is part of the FSC's guidance including "Education & Outreach" central theme. All residual fiber suppliers have potential to purchase their raw material from the sub-scopes, thus mitigation efforts are required on all feedstock to ensure the risk is negligible.

All feedstock data in the supply base will be collected via the Forest Feedstock (harvest locations) & Residual Fiber (operating forest areas) Questionnaires, where regional level maps can be created to show where the BP's suppliers sources interact with the specified risk indicators (if applicable in the region). All feedstock suppliers will be required to provide this information prior to receipt of fiber. The final output for this mitigation measure is a "Supplier Mapping Package", which contains detailed information on the interaction between residual suppliers' inferred supply base the specified risk indicators. The supplier mapping package forms the basis of the education and outreach material that will be communicated to residual fiber suppliers on an annual basis.

Note: Overlap with a specified risk polygon does not indicate feedstock must remain as specified risk. Suppliers, and subsequently the BP, can mitigate specified risk overlap by demonstrating how harvesting practices effectively manage for specified risks.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: United States

Area/sub-scope: PNW - Private Lands

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:	
All lands in the supply base area that are maintained in forest are likely to be regenerated after feedstock harvesting, whether due to federal policies, state laws, or natural processes. However, intentional conversion of stands out of forest use does occur on private lands throughout the supply base.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for regeneration in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being reforested (via planting or natural regeneration) or there is evidence to support the site being satisfactorily restocked, the Sustainability Team will approve the potential fiber source - If the site is not being reforested - or there is evidence of conversion to non-forest, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: United States	
Area/sub-scope: Montana & Wyoming - Private Lands	
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:	
Federal agencies follow regional forest plans which are meant to ensure ecologically sound forestry and would not permit harvest from low-productive areas on federal lands. Meanwhile, California, Idaho, Oregon, and Washington have laws that require regeneration of forests after harvest, which would make harvest from areas that are difficult to regenerate a violation of state law. Montana and Wyoming do not have regulations in place which pertain to the harvest of feedstock from low productivity sites on private lands.	
Mitigation measure:	
In the context of low productive sites, the states of Montana & Wyoming do not have public data relating to site productivity on private lands. Relating to areas that are difficult to regenerate, the states have spatial data relating to areas of grassland, shrubland, & sparse / barren lands. The BP will consider these areas of Montana & Wyoming as the equivalency of areas that are difficult to regenerate. Using the referenced spatial data & the Forest Feedstock Questionnaire to identify any of these land types in the database, the BP will avoid any forest feedstock sources that include the harvest from these areas. - If the harvested area of the harvest unit does not overlap or is not within 10m of identified difficult to regenerate areas, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source - If the harvested area of the harvest unit overlaps or is within 10m of identified difficult to regenerate areas, the Sustainability Team will consider the site as specified risk & reject the potential fiber source - The BP will not consider justification from the supplier that includes harvesting of these polygons as sufficient evidence for mitigation risk - Approved fiber sources will be subject to Phase 2 of the monitoring program & will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure	
Monitoring and outcomes:	
Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.	

Country: United States
Area/sub-scope: PNW - State & Private Forests

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:	
Not all requirements in the SBP standards require employee training to ensure compliance. For those that do, feedstock suppliers are incentivized by law to conduct such training. However, if the SBP standard is stricter than the legal standard such that specified risk is present, training may not occur. Specified risk that insufficient training may occur regarding indicators in which specified risk exists already.	
Mitigation measure:	
The BP will incorporate the requirements of the SFI Fiber Sourcing standard for Qualified Logging Professionals & information sharing to mitigate risk & provide training as it relates to this indicator. For all forest feedstock, the BP will incorporate questions in the Forest Feedstock Questionnaire asking: - has the supplier utilized a QLP for the proposed harvest unit? If the supplier utilizes QLPs & can provide evidence of completed training, the Sustainability Team will consider risk to be mitigated & approve the fiber source. If the supplier does not utilize QLPs or cannot provide evidence of completed training, the BP will provide links to training that the supplier can complete. If the supplier is not willing to complete training to be considered a QLP, the Sustainability Team will consider the harvest unit to be specified risk & reject the fiber source. As it relates to 2.2.1, 2.2.3, 2.2.4, 2.2.5, 2.2.10, & 3.2.2; the SFI Qualified Logger program requires training as it relates to forest management objectives including soil & water management as well as harvest practices & successful reforestation. As it relates to 4.2.7, the BP will incorporate information on the protection of designated cultural heritage sites in the Wood Producer's Information Package. A review of this documentation will be a contractual requirement before the Sustainability Team can approve the fiber source. The review of documentation as well as information in the mitigation measure for 4.2.7 will constitute sufficient training for this indicator.	
Monitoring and outcomes:	

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: United States	
Area/sub-scope: Wyoming - Private Lands	
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:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
Water quality and quantity is maintained or protected by federal and state regulations which are enforced by multiple regulatory agencies. Forest activities on federal lands are assessed under NEPA and follow various management plans. State and private activities follow state-level forest practices regulations or recommended BMPs. Operations on private lands on Wyoming, however, are not legally required to comply with BMPs, and limited data exists on the extent of active compliance.	
Mitigation measure:	
To address this indicator, will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if & how the supplier is implementing management strategies for water quality in forest management operations The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being managed with respect to water quality, the Sustainability Team will approve the potential fiber source - If the site is not being managed with respect to water quality, the Sustainability Team will reject the potential fiber source	

- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

Country: United States

Area/sub-scope: Idaho, Montana, & Wyoming - Private Lands

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:

The federal government has a long history of passing laws to protect and preserve historic sites on its own lands. Some states in the supply base have extended these protections to private lands, but others have not. Specified risk is assigned pertaining to the potential disturbance or destruction of designate cultural heritage sites on private lands in Idaho, Montana, or Wyoming.

Mitigation measure:

To mitigate risk to designated cultural heritage features in the identified states, the BP will incorporate both a review of spatial data for the National Register of Historic Places & questions in the Forest Feedstock Questionnaire to identify any heritage features that may be too sensitive for the public database.

The National Register of Historic Places is spatial representation of all public, NON-SENSITIVE OR RESTRICTED historic properties. This is of interest to Federal agencies, the National Park Service, State Historic and Tribal Historic Preservation Offices, local government and certified local governments, consultants, academia, and the interested public. This interest stems from the regulatory processes of

managing cultural resources that are consistent with the National Historic Preservation Act as Amended (NHPA), the National Environmental Policy Act as Amended, the Archaeological Resources Protection Act, and other laws related to cultural resources. The regulations promulgating these laws require the use of spatial data in support of various decisions and actions related to cultural resource management. Collectively, the National Register geo-spatial dataset is intended to be a comprehensive inventory of all cultural resources that are listed on the National Register of Historic Places.

The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure.

- If the site is being managed with respect to identified designated cultural heritage features, the Sustainability Team will approve the potential fiber source
- If the site is not being managed with respect to cultural heritage features, the Sustainability Team will reject the potential fiber source

Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure

Education & Outreach - Processing Residue & Tertiary Feedstock Suppliers

The intent of this mitigation option is to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities. The mitigation measure is part of the FSC's guidance including "Education & Outreach" central theme. All residual fiber suppliers have potential to purchase their raw material from the sub-scopes, thus mitigation efforts are required on all feedstock to ensure the risk is negligible.

All feedstock data in the supply base will be collected via the Forest Feedstock (harvest locations) & Residual Fiber (operating forest areas) Questionnaires, where regional level maps can be created to show where the BP's suppliers sources interact with the specified risk indicators (if applicable in the region). All feedstock suppliers will be required to provide this information prior to receipt of fiber. The final output for this mitigation measure is a "Supplier Mapping Package", which contains detailed information on the interaction between residual suppliers' inferred supply base the specified risk indicators. The supplier mapping package forms the basis of the education and outreach material that will be communicated to residual fiber suppliers on an annual basis.

Note: Overlap with a specified risk polygon does not indicate feedstock must remain as specified risk. Suppliers, and subsequently the BP, can mitigate specified risk overlap by demonstrating how harvesting practices effectively manage for specified risks.

Monitoring and outcomes:

Monitoring and outcomes for the BP's suite of mitigation measures are consistent across each indicator. Please see the Monitoring & Outcomes section in indicator 2.1.3 for the Alberta RRA for information on monitoring as it relates to the BP's mitigation measures.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 08 May 2026

Biomass Producer's stakeholder engagement end date: 08 Jun 2026

Total number of stakeholders contacted:

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

The BP will maintain a list of applicable stakeholders relevant for each region that it operates in. Incorporating stakeholders from the following groups:

- Industry / Suppliers
- Government
- First Nations
- NGOs
- Civil Society
- Academia

This list will be logged in the Jambo system, while being reviewed & updated annually as needed. Feedback will be collected from this list of stakeholders in the form of a consultation period when the BP:

- Transitions to updated Standards Requirements
- Updates control measures for applicable SBP Risk Assessments
- Completes the Recertification process
- Incorporates changes in the supply base (i.e. adding new regions)

Feedback from stakeholders will be recorded, acknowledged, & reviewed by the BP's Sustainability Team.

Feedback relating to certification & control measures received will be considered during the consultation period & considerations will be used for finalizing the BP's control measures as part of this process.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Gage Wasylyshen
Title	Report author
Date of report approval	22 Apr 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

United States Pacific Northwest	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Mechanisms & Supporting Evidence Federal and state law pertaining to forest management are enforced by agencies including the US Environmental Protection Agency, the US Army Corps of Engineers, and state forestry agencies. Enforcement of labor laws is typically a multi-agency effort coordinated under the US Department of Labor. Failure to comply with state and federal law can result in litigation and penalties. The California, Oregon, and Washington forest practice acts require the creation of harvest plans. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of state BMPs carry harsh penalties in Idaho, while compliance is voluntary in Montana. Regardless, recent audits in both found compliance exceeding 98%. An additional mechanism enforcement exists in California via the mandatory licensing of logging professionals. https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/ https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf https://californialoggers.com/services/prologger-certification-andtraining/licensed-timber-operator/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context: To avoid promoting unlawful activity, it is critical that biomass sourcing complies with all laws and regulations of the supply base area. Regulations & Enforcement:

	There are both federal and state level regulations related to forest management in the United States. Federal environmental laws include but are not limited to the National Environmental Policy Act of 1969, the Clean Air Act of 1970, the Clean Water Act of 1972, the Endangered Species Act of 1973, the National Forest Management Act of 1976, the Forest Land Policy and Management Act of 1976, the Federal Insecticide, Fungicide, and Rodenticide Act of 1948, amended in 1996. In addition, federal land management agencies develop area specific management plans including the 1994 Northwest Forest Plan, and management plans for individual National Forest or Bureau of Land Management units. Federal labor laws include but are not limited to the Fair Labor Standards Act of 1938, the Civil Rights act of 1964, and Chapter 77 of the US Code. State laws relating to forest management in the supply base include: • California Forest Practice Act • Idaho Forest Practices Act • Montana Forestry Best Management Practices Notification Law • Oregon Forest Practices Act • Washington Forest Practices Act Conclusion A variety of enforcement mechanisms exist on the federal and state level exist to ensure compliance with forest management laws in the United States. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Mechanisms & Supporting Evidence On federal land, timber trespass is approached seriously. For example, during active timber sales, the Forest Service implements timber theft prevention plans that involve the use of specialized tracer paint. The Forest Service has also developed software for determining the value of stolen trees. Nevertheless, little public data exists on the frequency of timber trespass on federal lands. The same is true of private & state lands. Anecdotal news stories regarding timber theft, when they occur, tend to consist of a small

	quantity of valuable trees being covertly harvested. Since the profile of wood procured by the BP is of low value compared to timber for lumber, veneer, or other products, & very large-scale illegal operations would need to occur for such an enterprise to be profitable, it is unlikely that any material procured by the BP would come from trespass. No evidence exists to suggest large-scale criminal enterprises exist in the US. Finally, the International Property Rights Index ranks the United States as having very strong property rights laws, assigning a ranking of 13 out of 129 countries. This index examines the robust relationship between property rights and other economic and social indicators of well being including gender equality, illicit trade, innovation, competition, research & development, human development, fighting corruption, & measures of internet connectedness. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=3346.&lawCode=CIV https://www.idl.idaho.gov/wp-content/uploads/sites/2/2020/06/timbertrespass-1.pdf https://leg.mt.gov/bills/mca/title_0700/chapter_0160/part_0010/section_0070/0700-0160-0010-0070.html https://oregon.public.law/statutes/ors_105.810 https://app.leg.wa.gov/rcw/default.aspx?cite=64.12.030 https://wyoleg.gov/InterimCommittee/2019/01-201906031301LSOTopicSummaryTrespass.pdf https://www.bidnet.com/bneattachments?/518697644.pdf https://www.fs.usda.gov/forestmanagement/products/measurement/tools/timbertheft/index.php https://www.internationalpropertyrightsindex.org/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context: ‘Timber trespass’ has varying legal definitions among US states, but generally refers to an individual or entity cutting down or injuring a tree belonging to someone else. Avoiding timber trespass when sourcing biomass is critical to compliance with the SBP criterion of legal operations and operators. Regulations & Enforcement: All states have laws relating to timber trespass: • California: Civil Code Section 3346 • Idaho: Section 6-202 • Montana: Code 70-16-107 • Oregon: ORS 105.810 • Washington: RCW 64.12.030 • Wyoming: WS 11-34-130 applies to state-owned land and does not protect timber on private lands. General laws relating to theft of property can be found in WY 6-3-402.

	With the exception of Wyoming, all of these codes are enforced by civil lawsuits filed by the victim for the value of the trees removed. In Wyoming, code violations are addressed via fines and/or imprisonment. Conclusion: Forests in the supply base are subject to various forms of active regulation and oversight. Any large-scale timber theft would be highly conspicuous in such an environment. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	Mechanisms & Supporting Evidence Compliance with CITES can be achieved easily if tree species listed in the convention are rare or nonexistent in the supply base. To find a definitive list of common species in the supply base, one can reference the locally appropriate species lists found in the variant overviews of the Forest Vegetation Simulator (FVS). The US Forest Service developed FVS to model growth of common and ecologically important tree species in each region of the United States, and any species not included in these variant overviews would be a minor component of the local forest. None of these species are protected by CITES. https://cites.org/eng/disc/what.php https://environment.ec.europa.eu/topics/forests/deforestation/illegallogging/timberregulation_en#objectives https://www.fws.gov/cites/usfws-leaders-cites https://cites.org/eng/disc/text.php#III https://www.fs.usda.gov/fvs/documents/guides.shtml https://cites.org/sites/default/files/eng/app/2023/E-Appendices-2023-0504.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context CITES (The Convention on International Trade in Endangered Species and Wild Fauna and Flora) and EUTR (The European Union Timber Regulation) are international trade agreements.

	The aim of CITES is to ensure that international trade in specimens of wild animals and plants does not threaten the survival of the species. EUTR, meanwhile, has three key goals: a) prohibit the placement of illegally harvested timber and products derived from such timber on the EU market b) require EU operators who place timber products on the EU market to exercise due diligence to minimize the risk of placing illegally harvested timber, or timber products containing illegally harvested timber c) require EU traders to keep records of their suppliers and customers Feedstock products may be exported to the EU, and therefore sourcing must comply with both EUTR and CITES. Regulations & Enforcement Goals a) and b) of EUTR are addressed by other indicators in this document (1.1.1 and 1.1.5). The BP will be able to comply with goal c) via diligent documentation of sourcing activities. Meanwhile, the US is a Contracting Party in CITES, and under the Endangered Species Act, the US Fish and Wildlife Service is responsible for carrying out the provisions of CITES. The rules of CITES restrict the international trade of species (or products derived from those species) listed in the convention text. Conclusion Compliance with EUTR is covered in other indicators (1.1.1 and 1.1.5). Additionally, there are no major tree species in the supply base which are protected under CITES. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	Mechanisms & Supporting Evidence: Tax evasion can be uncovered through audits, and can result in large fines or imprisonment. Penalties are also assessed for late payment of taxes, increasing the likelihood that payments will be timely and up to date. https://www.bidnet.com/bneattachments?/518697644.pdf https://www.timbertax.org/statetaxes/quickreference/ https://www.irs.gov/businesses/small-businesses-self-employed/irs-audits https://www.irs.gov/pub/irs-utl/tax_crimes_handbook.pdf https://www.irs.gov/payments/failure-to-file-penalty

	For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context In situations where feedstock that is being sold is not harvested from lands owned by the seller, it is important that the seller pays the landowner for relevant harvest rites. Additionally, many states and municipalities have taxes on the harvest of forest products which the seller or landowner must pay. Regulations & Enforcement If a feedstock seller fails to reimburse the landowner for the harvested material, the landowner can file a lawsuit to recover the money owed. On federal lands, revenue from timber sales is tracked carefully to ensure timely scaling of materials and proper reimbursement by the mills which purchase wood fiber. Tracking mechanisms on private land are at the discretion of the seller. Taxation considerations for private landowners include the harvest taxes on timber in California, Idaho, Montana, Oregon, and Washington. These landowners are also subject to federal income tax and state income taxes in California, Idaho, Oregon, and Montana. These taxes are enforced by the Internal Revenue Service (IRS) on the federal level, and by state tax agencies on the state level. Conclusion For parties who are owed money relating to a feedstock transaction, multiple avenues to recoup those payments exist. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	Mechanisms & Supporting Evidence On federal land, timber trespass is approached seriously. For example, during active timber sales, the Forest Service implements timber theft prevention plans that involve the use of specialized tracer paint. The Forest Service has also developed software for determining the value of stolen trees. A 1990 report by the Government Accountability Office estimated that illegal

	or unauthorized activities occur on less than 1% of mining claims on federal land in California, Arizona, and Nevada. Little public data exists on the frequency of timber trespass and illegal mining on federal or private lands. This would imply they are rare crimes, as the US regularly collects and publishes criminal data for most common offenses. https://www.usaid.gov/biodiversity/illegal-logging-and-deforestation https://greentumble.com/the-dangerous-effects-of-illegal-mining https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=3346.&lawCode=CIV https://www.idl.idaho.gov/wp-content/uploads/sites/2/2020/06/timbertrespass-1.pdf https://leg.mt.gov/bills/mca/title_0700/chapter_0160/part_0010/section_0070/0700-0160-0010-0070.html https://oregon.public.law/statutes/ors_105.810 https://app.leg.wa.gov/rcw/default.aspx?cite=64.12.030 https://wyoleg.gov/InterimCommittee/2019/01-201906031301LSOTopicSummaryTrespass.pdf https://www.fs.usda.gov/about-agency/lei https://www.blm.gov/programs/public-safety-and-fire/law-enforcement https://www.bidnet.com/bneattachments?/518697644.pdf https://www.fs.usda.gov/forestmanagement/products/measurement/tools/timbertheft/index.php https://www.gao.gov/assets/rced-90-111.pdf https://www.fbi.gov/how-we-can-help-you/more-fbi-services-andinformation/ucr For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context According to the United States Agency for International Development, illegal logging is a serious problem that threatens the world's forests and generates over \$50B annually in revenue for perpetrators. Illegal mining, meanwhile, can cause contamination of soil and groundwater, chemical leakages, and the formation of sinkholes. Regulations & Enforcement 'Timber trespass' has varying legal definitions among US states, but generally refers to an individual or entity cutting down or injuring a tree belonging to someone else. All states in the supply base have laws relating to timber trespass: • California: Civil Code Section 3346 • Idaho: Section 6-202

	• Montana: Code 70-16-107 • Oregon: ORS 105.810 • Washington: RCW 64.12.030 • Wyoming: WS 11-34-130 applies to state-owned land and does not protect timber on private lands. General laws relating to theft of property can be found in WY 6-3-402. With the exception of Wyoming, all of these codes are enforced by civil lawsuits filed by the victim for the value of the trees removed. In Wyoming, code violations are addressed via fines and/or imprisonment. For federal lands, both the US Forest Service and Bureau of Land Management (BLM) have law enforcement personnel on staff who are responsible for investigating vandalism, looting, and other unlawful activities. The BLM administers 245 million acres of surface resources, and 700 million acres of subsurface resources, meaning that on one ownership, multiple entities often have a vested interest in preventing illegal mining activities. Conclusion Private landowners in the US have legal recourse to respond to illicit activities on their forestland. On federal lands, multiple law enforcement jurisdictions are in place to dissuade illegal mining and logging. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Mechanisms & Supporting Evidence Databases which include location information for key species, habitats, ecosystems, and areas of HCV are available on a state-by-state basis. • California: California Natural Diversity Database • Idaho: Idaho Species • Montana: Montana Natural Heritage Program • Oregon: Oregon State University Institute for Natural Resources • Washington: Priority Habitats and Species • Wyoming: Wyoming Natural Diversity Database

	Additionally, the Forest Stewardship Council has established a methodology for identifying HCV areas. They identified specific areas in the supply base which qualify as the following two HCV classes: • HCV 1: Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g., endemism, endangered species, refugia); • HCV 3: Forest areas that are in or contain rare, threatened or endangered ecosystems; https://fws.gov/node/266482 https://wildlife.ca.gov/Conservation/CESA https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=2971 default.aspx (wa.gov) https://wildlife.ca.gov/Data/CNDDDB https://idfg.idaho.gov/species/observations/list?category=35&species_id=15974&county_id=All&field_datetime_value%5Bmin%5D%5Bdate%5D=&field_datetime_value%5Bmax%5D%5Bdate%5D=@ion_id=All&gm_u_id=All&items_per_page=25 https://mtnhp.org/ https://inr.oregonstate.edu/main/data https://wdfw.wa.gov/species-habitats/at-risk/phs/maps https://www.uwyo.edu/wyndd/index.html https://us.fsc.org/preview.fsc-us-hcvf-assessment-framework.a-190.pdf https://us.fsc.org/en-us/certification/controlled-wood/fsc-us-controlled-woodnational-risk-assessment-us-nra For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context The most vulnerable and/or critical species and ecosystems in the forest landscape of the supply base must be identified to allow the creation of mitigation plans which protect those species and ecosystems. Regulations & Enforcement The Endangered Species Act (ESA) of 1973 outlines a process for identifying, classifying, and protecting the most vulnerable species and ecosystems in the United States on a federal level. All forest management activities must comply with ESA requirements for listed species. Additionally, several states have their own endangered species laws. They are as follows: California: California Endangered Species Act Oregon: Oregon Wildlife Diversity Plan Washington: WAC 220-610-110 Violations of federal or state endangered species provisions carry a variety of punishments, ranging from fines to imprisonment. The US Fish & Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) work in cooperation with federal and state agencies to ensure protection of vulnerable species and their respective habitats. Under Section 7 of the ESA, any forest

	management activities carried out with involvement of a federal agency must have an associated biological opinion (BO) which identifies endangered species in the ecosystem and outlines mitigation measures. Section 10 establishes an analogous process called a habitat conservation plan (HCP) for projects without federal agency involvement. Conclusion: Due to the public availability of extensive documentation and geospatial information on key species, habitats, ecosystems, and areas of HCV, and multiple state and Federal regulatory or advisory agencies, Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	Mechanisms & Supporting Evidence New BOs and HCPs are written regularly, with nearly 3,000 and 5,000 having been published since the year 2000, respectively. An additional layer of protection exists in environmental non-profit organizations, who can sue the government if they feel that a BO or HCP has inadequately considered impacts to one or more species of concern. Between 2005 and 2015, 141 such lawsuits were filed. Federal actions are subject to review under NEPA. NEPA is primarily enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. https://fws.gov/node/266482 https://wildlife.ca.gov/Conservation/CESA https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=2971 https://app.leg.wa.gov/WAC/default.aspx?cite=220-610-110&pdf=true https://www.epa.gov/nepa/what-national-environmental-policy-act https://ecos.fws.gov/ecp/report/adhocCreator?catalogId=species&reportId=bo https://www.gao.gov/assets/gao-17-304.pdf

	https://academic.oup.com/jof/article/118/4/403/5825558 For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NF-FOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Potential impacts of feedstock harvest activities on vulnerable and/or critical species and ecosystems in the forest landscape of the supply base must be identified so that a plan can be put in place to mitigate these impacts. Regulations & Enforcement The Endangered Species Act (ESA) of 1973 outlines a process for identifying, classifying, and protecting the most vulnerable species and ecosystems in the United States on a federal level. All forest management activities must comply with ESA requirements for listed species. Additionally, several states have their own endangered species laws. They are as follows: • California: California Endangered Species Act • Oregon: Oregon Wildlife Diversity Plan • Washington: WAC 220-610-110 Violations of federal or state endangered species provisions carry a variety of punishments, ranging from fines to imprisonment. The US Fish & Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) work in cooperation with federal and state agencies to ensure protection of vulnerable species and their respective habitats. Under Section 7 of the ESA, any forest management activities carried out on federal land must have an associated biological opinion (BO) which identifies endangered species in the ecosystem and outlines mitigation measures. BOs are also required on private and state land if a federal agency is involved in the project. If a federal agency is not involved in the project, Section 10 of the ESA still requires that a habitat conservation plan (HCP) be created to mitigate impacts to endangered species from activities on private and state lands. An additional legislative consideration on federal lands is the National Environmental Policy Act (NEPA) of 1969, which requires that federal agencies identify environmental impacts of activities they carry out, fund, or permit. Conclusion Due to multiple layers of legislation that require forest managers to consider impacts of their activities on vulnerable species and ecosystems, Low risk is assigned on all land types in the supply base.

	For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence New BOs and HCPs are written regularly, with nearly 3,000 and 5,000 having been published since the year 2000, respectively. An additional layer of protection exists in environmental non-profit organizations, who can sue the government if they feel that a BO or HCP has inadequately considered impacts to one or more species of concern. Between 2005 and 2015, 141 such lawsuits were filed. Federal actions are subject to review under NEPA. NEPA is primarily enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. Many believe the ESA has been successful in maintaining biodiversity in the United States, with 99% of the 1,600 species listed under it still extant. The Center for Biological Diversity found in 2012 that 90% of listed species are recovering under the rate specified in their Recovery Plans. While it is difficult to precisely measure biodiversity on the national (or even regional) scale, these statistics are positive indicators for the future of biodiversity in the supply base. The Forest Stewardship Council has established a methodology for identifying HCV areas. In their USA national risk assessment, they identified specific areas in the supply base which qualify as the following two HCV classes (Figure 4): • HCV 1: Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g., endemism, endangered species, refugia); • HCV 3: Forest areas that are in or contain rare, threatened or endangered ecosystems; HCV 3 areas are addressed in Indicator 3.2.3. In their assessment, changes in forest structure resulting from management activities were identified as a threat to biodiversity in HCV 1 areas. However, much of

	the area identified as HCV 3 is contained in National Forest land that is managed under the Northwest Forest Plan. The Northwest Forest Plan is designed to ensure habitat and ecosystem management are prioritized when making management decisions. It is therefore unlikely that forest structural changes would occur during feedstock sourcing on these lands. Outside the Northwest Forest Plan area, harvest in HCV 3 is limited by several factors, including federal or state laws or policies related directly to old forest protection or to endangered species protection, and lack of commercially harvestable timber species. https://www.usaid.gov/biodiversity https://fws.gov/node/266482 https://wildlife.ca.gov/Conservation/CESA https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=2971 https://app.leg.wa.gov/WAC/default.aspx?cite=220-610-110&pdf=true https://www.fisheries.noaa.gov/national/endangered-speciesconservation/recovery-species-under-endangered-species-act https://www.epa.gov/nepa/what-national-environmental-policy-act https://ecos.fws.gov/ecp/report/adhocCreator?catalogId=species&reportId=b0 https://www.gao.gov/assets/gao-17-304.pdf https://academic.oup.com/jof/article/118/4/403/5825558 https://www.goodnewsnetwork.org/earth-talk-how-effective-is-endangeredspecies-act/ https://www.scientificamerican.com/article/endangered-species-act-successfailure/ https://www.epa.gov/report-environment/diversity-and-biological-balance https://us.fsc.org/preview.fsc-us-hcvf-assessment-framework.a-190.pdf https://us.fsc.org/en-us/certification/controlled-wood/fsc-us-controlled-woodnational-risk-assessment-us-nra https://www.fs.usda.gov/r6/reo/library/downloads/documents/NWFP-FSEIS1994-I.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context According to the US Agency for International Development, biodiversity conservation in forests is needed to protect the 1.6 billion people worldwide who depend on forests for their livelihoods. Sourcing feedstock should not impede this goal. Regulations & Enforcement The Endangered Species Act (ESA) of 1973 outlines a process for identifying, classifying, and protecting the most vulnerable species and ecosystems in the United States on a federal level. All forest management activities must comply with ESA

	requirements for listed species. Additionally, several states have their own endangered species laws. They are as follows: • California: California Endangered Species Act • Oregon: Oregon Wildlife Diversity Plan • Washington: WAC 220-610-110 Violations of federal or state endangered species provisions carry a variety of punishments, ranging from fines to imprisonment. The US Fish & Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) work in cooperation with federal and state agencies to ensure protection of vulnerable species and their respective habitats. These agencies create—and regularly update—Recovery Plans for all species listed under the ESA. In addition to the National Environmental Policy Act (NEPA), which requires that federal agencies identify environmental impacts of activities they carry out, fund, or permit, federal agencies must also comply with Section 7 of the ESA. This article stipulates that any activities carried out with involvement of a federal agency must have an associated biological opinion (BO) which identifies endangered species in the ecosystem and outlines mitigation measures. BOs are also required on private and state land if a federal agency is involved in the project. If a federal agency is not involved in the project, Section 10 of the ESA still requires that a habitat conservation plan (HCP) be created to mitigate impacts to endangered species from activities on private and state lands. Conclusion There are multiple layers of legislation that require forest managers to consider and mitigate the impacts of their activities on vulnerable species and ecosystems. Additionally, data on the efficacy of the Endangered Species Act for preserving biodiversity in the supply base are promising. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence Actions on federal land, including conversions of forestland, are subject to

review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The US Department of Agriculture publishes factsheets on each state which quantify forest gain and loss. Of the states in the supply base, California, Oregon, and Washington show a small net loss of forested acreage on an average year, while Idaho and Montana show small net increases. All states in the supply base convert some private acres out of forest use each year. Additionally, the Forest Stewardship Council has identified several counties in the supply base as being at high risk of conversion due to urban development (Figure 4).

Violations of the CWA are investigated by the US Environmental Protection Agency (EPA) and can carry hefty fines. Additionally, if the violation resulted in negative impacts to endangered wildlife, additional penalties and mitigation may be required by FWS and state wildlife management agencies, such as the California Department of Fish and Wildlife. Grasslands in the US are often converted to agricultural use, however no publicly available information exists suggesting that they are often (or ever) intentionally converted to forestland, which would be necessary in order for feedstock to be harvested from them.

<https://www.usgs.gov/news/featured-story/tracking-causes-andconsequences-land-change>
<https://www.fs.usda.gov/about-agency/what-we-believe>
<https://www.blm.gov/about/our-mission>
<https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/>
<https://law.justia.com/codes/idaho/2022/title-38/chapter-13/section-38-1312/>
<https://www.oregon.gov/odf/Pages/lawsrules.aspx>
<http://test.oria.wa.gov/permithandbook/permitdetail/230>
<https://www.epa.gov/cwa-404/permit-program-under-cwa-section-404>
<https://www.fws.gov/service/grassland-easements>
<https://academic.oup.com/jof/article/118/4/403/5825558>
https://public.tableau.com/views/FIA_OneClick_V1_2/StateSelection?%3AshowVizHome=no
<https://us.fsc.org/en-us/certification/controlled-wood/fsc-us-controlled-woodnational-risk-assessment-us-nra>
<https://www.epa.gov/enforcement/criminal-provisions-water-pollution>
<https://wildlife.ca.gov/Conservation/Environmental-Review/LSA#55227742notify-online>
<https://www.nature.com/articles/s41467-020-18045-z>

For an assessment of Federal Lands, See Interim US National Forest RRA
https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-

	RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context The conversion of forest, agriculture, and grasslands to development can change hydrology at local and regional scales, alter wildlife habitat, and affect local weather patterns. This indicator is particularly pertinent to a large country like the US which contains all four land types listed: forests, wetlands, peatlands, and highly biodiverse grasslands. Regulations & Enforcement Federal forestlands in the supply base are owned and managed mostly by the US Forest Service and Bureau of Land Management (BLM). Both entities manage their lands under 'multiple-use' management concepts; the Forest Service commits to 'Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated lands,' while the BLM has 'Conservation' and 'Restoration' as two of their five key priorities. In addition, federal land management agencies develop area specific management plans, such as the 1994 Northwest Forest Plan, and management plans for individual National Forest or BLM units. Collectively, these policies mean that converting federal lands out of forest use is a low probability action. Conversely, conversion of private forestlands to non-forest use is permitted in all states in the supply base. However, in California, Idaho, Oregon, and Washington, permits must be filed with the state prior to a conversion. Any discharge of dredged or fill material into a wetland or peatland is regulated under Section 404 of the Clean Water Act (CWA). This includes fill for development, water resource projects, infrastructure development, and mining projects. To successfully be permitted under the CWA, the applicant must demonstrate that all potential impacts to water quality have been minimized, and that any unavoidable impacts will be compensated. Laws in the US do not prohibit the conversion of grasslands, however incentive programs do exist to encourage the protection of grasslands from agricultural expansion via programs like Grassland Easements through the US Fish and Wildlife Service. Conclusion Federal lands are well protected against conversion of all types, both by overarching policies and by specific management plans for each forest unit and region. On private lands, conversion of wetlands and peatlands is strongly limited by the Clean Water Act, and conversion of grasslands to forestland is not a common occurrence. However, conversion of private forestland to other uses is relatively common. Specified risk is assigned pertaining to the possibility of harvesting feedstock from lands that have been converted out of forest use.

	For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Mechanisms & Supporting Evidence Federal and state law pertaining to forest management on private lands are enforced by agencies including the US Environmental Protection Agency, US Army Corps of Engineers, and state forestry agencies. Failure to comply with state and federal law can result in litigation and penalties. Actions on federal land are subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The California, Oregon, and Washington forest practice acts require the creation of harvest plans which demonstrate compliance with regulations for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of forest practice regulations carry harsh penalties in Idaho, while compliance is voluntary in Montana. Regardless, recent audits in both found compliance exceeding 98%. In Wyoming, use of BMPs on state lands is required, with audits showing BMPs successfully mitigated impacts to soil. Use of BMPs on Wyoming private lands is voluntary, and limited data exists on levels of compliance. All six states are actively engaged in updating their BMPs to keep up with changing attitudes and scientific research. It is important to take a multi-faceted analysis approach to analyzing the efficacy of these policies as they pertain to this indicator; not every instance of feedstock harvest will have a neutral or negative effect on every ecosystem service. The question is if, on a landscape level, feedstock sourcing on the supply base will negatively, neutrally, or positively impact overall ecosystem health. More detailed analyses of specific ecosystem services on smaller spatial scales are addressed in other indicators of this supply base evaluation. Multiple data points are available which suggest that laws and regulations in the United States have facilitated a forest management regime which produces positive ecological impacts. For example, the Center for Biological Diversity found in 2012 that 90% of endangered species listed under the Endangered Species Act are recovering under the rate specified in their

Recovery Plans. Similarly, a long-term study that monitored 25 different water quality indicators found improvement across nearly all of them between 1962 and 2001. The study included 50 million water quality measurements at 240,000 sites throughout the U.S. Additionally, the share of rivers safe for fishing increased by 12 percent across this same time period. Finally, economic services of forests have trended positively, including industrial production of forest products and outdoor recreation.

Carbon stocks and forest biomass have also been increasing: the US Department of Agriculture publishes factsheets on each state which quantify forest gain and loss. In California, Oregon, and Washington, the average annual change in standing wood volumes is positive. In Idaho and Montana, the average annual change in standing wood volumes is negative, but in these states losses are mainly due to mortality—not harvest removals. Harvest removals are 10% of growth gross in Idaho and 19% of gross growth in Montana. For Wyoming, a separate US Forest Service report showed that harvest in Wyoming is 9% of gross growth. Inventory volume across the state, however, is declining at 3.5% per year on average, primarily due to fire and insect mortality.

A critical piece of the puzzle is the unnaturally high densities of smaller trees in fire-prone forests across the supply base. This ecosystem condition is a major contributing factor to the wildfire-induced mortality that has been observed in all states in the supply base.

The introduction of the BP as a new feedstock consumer could help mitigate the densities of these fuels, thereby enhancing ecosystem health and helping to solve one of the biggest problems facing the forests of the United States.

<https://academic.oup.com/forestry/article/91/2/151/4282674>

<https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/>

<https://www.idl.idaho.gov/about-forestry/forest-practices-act/>

<https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices>

<https://www.oregon.gov/odf/Pages/lawsrules.aspx>

<https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09>

<https://wsfd.wyo.gov/forest-management/bmp-s>

<https://academic.oup.com/jof/article/118/4/403/5825558>

<https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices>

<https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf>

<https://drive.google.com/file/d/14gKwFYAW9EM5cl5ASDGtjb5oazwpnLFt/view?usp=sharing>

<https://www.scientificamerican.com/article/endangered-species-act-successfailure/>

<https://news.berkeley.edu/2018/10/08/clean-water-act-dramatically-cutpollution-in-u-s-waterways/>

https://www.fpl.fs.usda.gov/documnts/fplrp/fpl_rp701.pdf

	https://www.forbes.com/sites/forbescommunicationscouncil/2021/11/15/whythe-future-of-outdoor-recreation-is-purposeful-protective-and-powerful/?sh=56d7cd6679ce https://public.tableau.com/views/FIA_OneClick_V1_2/StateSelection?%3AshowVizHome=no https://www.fs.usda.gov/rm/pubs_series/rmrs/rb/rmrs_rb028.pdf https://www.perc.org/2021/04/12/fix-americas-forests-reforms-to-restorenational-forests-and-tackle-the-wildfire-crisis/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Forests provide a variety of ecosystem services, including timber/biomass production, carbon storage, biodiversity, health and recreation, water supply and quality and flood protection. The way forests are managed on the landscape level dictates the longevity and efficacy of those services. Feedstock sourcing should be carried out in a way that maintains or enhances those services. Regulations & Enforcement A variety of federal and state laws exist in the supply base which promote ecologically sound forest management. Federal laws include but are not limited to the National Environmental Policy Act of 1969, the Clean Air Act of 1970, the Clean Water Act of 1972, the Endangered Species Act of 1973, the National Forest Management Act of 1976, the Forest Land Policy and Management Act of 1976, and the Federal Insecticide, Fungicide, and Rodenticide Act of 1948. In addition, federal land management agencies develop area specific management plans such as the 1994 Northwest Forest Plan and management plans for individual National Forest or Bureau of Land Management units. State laws in the supply base include: • California: California Forest Practice Act • Idaho: Idaho Forest Practices Act • Montana: Montana Forestry Best Management Practices Notification Law • Oregon: Oregon Forest Practices Act • Washington: Washington Forest Practices Act Wyoming does not have a forest practices act, but does publish BMPs for forestland operations. Conclusion In the past half-century, a wide variety of state and federal laws have been passed with the goal of improving forest ecosystem health and services. On the landscape level, a large body of evidence suggests that these laws have had positive impacts on the nation's forests. Moreover, the introduction of the BP as a new consumer of low-grade woody material has the potential to mitigate major threats currently facing forests in the supply base. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf

	RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Mechanisms & Supporting Evidence Federal and state law pertaining to forest management on private lands are enforced by agencies including the US Environmental Protection Agency, US Army Corps of Engineers, and state forestry agencies. Failure to comply with state and federal law can result in litigation and penalties. Actions on federal land are subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The California, Oregon, and Washington forest practice acts require the creation of harvest plans which demonstrate compliance with regulations for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of forest practice regulations carry harsh penalties in Idaho, while compliance is voluntary in Montana. Regardless, recent audits in both found compliance exceeding 98%. In Wyoming, use of BMPs on state lands is required, with audits showing BMPs successfully mitigated impacts to soil. Use of BMPs on Wyoming private lands is voluntary, and limited data exists on levels of compliance. All six states are actively engaged in updating their BMPs to keep up with changing attitudes and scientific research. It is important to take a multi-faceted analysis approach to analyzing the efficacy of these policies as they pertain to this indicator; not every instance of feedstock harvest will have a neutral or negative effect on every ecosystem service. The question is if, on a landscape level, feedstock sourcing on the supply base will negatively, neutrally, or positively impact overall ecosystem health. More detailed analyses of specific ecosystem services on smaller spatial scales are addressed in other indicators of this supply base evaluation. Multiple data points are available which suggest that laws and regulations in the United States have facilitated a forest management regime which produces positive ecological impacts. For example, the Center for Biological Diversity found in 2012 that 90% of endangered species

listed under the Endangered Species Act are recovering under the rate specified in their Recovery Plans. Similarly, a long-term study that monitored 25 different water quality indicators found improvement across nearly all of them between 1962 and 2001. The study included 50 million water quality measurements at 240,000 sites throughout the U.S. Additionally, the share of rivers safe for fishing increased by 12 percent across this same time period. Finally, economic services of forests have trended positively, including industrial production of forest products and outdoor recreation.

Carbon stocks and forest biomass have also been increasing: the US Department of Agriculture publishes factsheets on each state which quantify forest gain and loss. In California, Oregon, and Washington, the average annual change in standing wood volumes is positive. In Idaho and Montana, the average annual change in standing wood volumes is negative, but in these states losses are mainly due to mortality—not harvest removals. Harvest removals are 10% of growth gross in Idaho and 19% of gross growth in Montana. For Wyoming, a separate US Forest Service report showed that harvest in Wyoming is 9% of gross growth. Inventory volume across the state, however, is declining at 3.5% per year on average, primarily due to fire and insect mortality.

A critical piece of the puzzle is the unnaturally high densities of smaller trees in fire-prone forests across the supply base. This ecosystem condition is a major contributing factor to the wildfire-induced mortality that has been observed in all states in the supply base. The introduction of the BP as a new feedstock consumer could help mitigate the densities of these fuels, thereby enhancing ecosystem health and helping to solve one of the biggest problems facing the forests of the United States.

<https://academic.oup.com/forestry/article/91/2/151/4282674>
<https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/>
<https://www.idl.idaho.gov/about-forestry/forest-practices-act/>
<https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices>
<https://www.oregon.gov/odf/Pages/lawsrules.aspx>
<https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09>
<https://wsfd.wyo.gov/forest-management/bmp-s>
<https://academic.oup.com/jof/article/118/4/403/5825558>
<https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices>
<https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf>
<https://drive.google.com/file/d/14gKwFYAW9EM5cl5ASDGtjb5oazwpmLFt/view?usp=sharing>
<https://www.scientificamerican.com/article/endangered-species-act-successfailure/>
<https://news.berkeley.edu/2018/10/08/clean-water-act-dramatically-cut-pollution-in-u-s-waterways/>
https://www.fpl.fs.usda.gov/documnts/fplrp/fpl_rp701.pdf

	https://www.forbes.com/sites/forbescommunicationscouncil/2021/11/15/whythe-future-of-outdoor-recreation-is-purposeful-protective-and-powerful/?sh=56d7cd6679ce https://public.tableau.com/views/FIA_OneClick_V1_2/StateSelection?%3AshowVizHome=no https://www.fs.usda.gov/rm/pubs_series/rmrs/rb/rmrs_rb028.pdf https://www.perc.org/2021/04/12/fix-americas-forests-reforms-to-restorenational-forests-and-tackle-the-wildfire-crisis/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RR-USA-NFFOR_v1.0-RR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context According to Grigal (2000), “It is axiomatic that forest management activities alter soil physical, chemical, and biological properties.” Implementing Best Management Practices (BMPs) is a critical part of managing these impacts and ensuring soil quality is maintained. Regulations & Enforcement There are both federal and state level regulations related to BMPs for forest management in the United States. Federal laws affecting forest management include but are not limited to the National Environmental Policy Act of 1969, the Clean Water Act of 1972, the Endangered Species Act of 1973, the National Forest Management Act of 1976, the Forest Land Policy and Management Act of 1976, amended in 1996. In addition, federal land management agencies develop area specific management plans including the 1994 Northwest Forest Plan, and management plans for individual National Forest or Bureau of Land Management units. State laws in the supply base include: • California: California Forest Practice Act • Idaho: Idaho Forest Practices Act • Montana: Montana Forestry Best Management Practices Notification Law • Oregon: Oregon Forest Practices Act • Washington: Washington Forest Practices Act All of these BMP-related state rules have provisions for soil erosion and compaction mitigation. Wyoming does not have a forest practices act, but does publish BMPs for forestland operations. Conclusion Soil quality is maintained or protected by federal and state regulations which are enforced by multiple regulatory agencies. Forest activities on federal lands are assessed under NEPA and follow various management plans. State and private activities follow state-level forest practices regulations or recommended BMPs. Operations on private lands on Wyoming, however, are not legally required to comply with BMPs, and limited data exists on the extent of active compliance. As a result, Specified risk is assigned to the procurement of feedstock from

	private lands in Wyoming & low risk for the rest of the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RR-USA-NFFOR_v1.0-RR-USA-National-FOR_Interim.pdf
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence Federal and state law pertaining to BMPs are enforced by agencies including the US Environmental Protection Agency, US Army Corps of Engineers, and state forestry agencies. Failure to comply with state and federal law can result in litigation and penalties. Actions on federal land are also subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land management agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The California, Oregon, and Washington forest practice acts require the creation of harvest plans which incorporate BMPs for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Recent audits in both states found BMP compliance exceeding 98%. In Wyoming, while use of BMPs on state lands is required, it is voluntary on private lands, and limited data exists on levels of compliance. Notably, non-industrial private forestland comprises less than 15% of forests. All six states are actively engaged in updating and revising their BMPs to keep up with changing attitudes and scientific research. https://www.uidaho.edu/-/media/UIDahoResponsive/Files/Extension/topic/forestry/f12-forest-fire-risk-reductionforflash.pdf?la=en&hash=1C2A6E8569310F63DCD30BE1099B7356257B30FE https://www.science.org/doi/full/10.1126/science.1128834 https://www.epa.gov/nepa/what-national-environmental-policy-act https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=stelprdb5349922 https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2_026990 https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/

	https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://leg.mt.gov/bills/mca/title_0760/chapter_0130/part_0040/sections_index.html https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://wsfd.wyo.gov/forest-management/bmp-s https://academic.oup.com/jof/article/118/4/403/5825558 https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf https://drive.google.com/file/d/14gKwFYAW9EM5cl5ASDGtjb5oazwpnLFt/view?usp=sharing https://apps.fs.usda.gov/nicportal/temp/pdf/sfs/naweb/WY_std.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Logging residues, or “slash,” can be a serious fire hazard in certain ecosystems. Wildfires can cause irreversible negative impacts to ecosystems, and feedstock harvesting should not contribute to them. Regulations & Enforcement On federal lands, actions are subject to the National Environmental Policy Act (NEPA), which requires that agencies assess the environmental effects of their actions. Under this act, federal land management agencies have developed area specific management plans such as the 1994 Sierra Nevada Forest Plan in California and the Northwest Forest Plan in Washington and Oregon. These plans contain slash management provisions which serve to mitigate wildfire risk in fire-prone ecosystems. On the state level, the following laws require slash management during forest activities: • California Forest Practice Act • Idaho Forest Practices Act • Montana Timber Slash and Debris Law • Oregon Forest Practices Act • Washington Forest Practices Act Wyoming does not have laws relating to slash management on state and private lands but does publish best management practices (BMPs) which include slash treatment recommendations. Conclusion Unmanaged slash can contribute to catastrophic wildfires. Therefore, laws have been passed which require slash management for wildfire mitigation on state and federal lands. The same is true on private lands, except for those in Wyoming. Specified risk is assigned pertaining to the possibility of slash mitigation not being performed on private lands in Wyoming. For all other state and private lands, risk is Low. For an assessment of Federal Lands, See Interim US National Forest RRA

	https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Mechanisms & Supporting Evidence Federal and state law pertaining to BMPs are enforced by agencies including the US Environmental Protection Agency, US Army Corps of Engineers, and state forestry agencies. Failure to comply with state and federal law can result in litigation and penalties. Actions on federal land are also subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The California, Oregon, and Washington forest practice acts require the creation of harvest plans which incorporate BMPs for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of state BMPs carry penalties in Idaho and Montana, and recent audits in both found states compliance exceeding 98%. In Wyoming, use of BMPs on state lands is required, with audits showing BMPs successfully mitigated impacts to water quality. Use of BMPs on Wyoming private lands is voluntary, and limited data exists on levels of compliance. However, non-industrial private forestland comprises less than 15% of forests. All six states are actively engaged in updating and revising their BMPs to keep up with changing attitudes and scientific research. https://www.sciencedirect.com/science/article/pii/S0378112722003917 https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/ https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://dnrc.mt.gov/_docs/forestry/SMZFullcopy.pdf https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://wsfd.wyo.gov/forest-management/bmp-s https://academic.oup.com/jof/article/118/4/403/5825558 https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf

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Risk Rating justification	Context According to Shah et al. (2022), forest management can impact water quality in a range of ways including changes to sediment delivery, nutrient losses, carbon transport, metal and base cation releases, acidity and temperature. Implementing Best Management Practices (BMPs) is a critical part of managing these impacts. Regulations & Enforcement There are both federal and state level regulations related to BMPs for forest management in the United States. Federal laws affecting forest management include but are not limited to the National Environmental Policy Act of 1969, the Clean Air Act of 1970, the Clean Water Act of 1972, the Endangered Species Act of 1973, the National Forest Management Act of 1976, the Forest Land Policy and Management Act of 1976, the Federal Insecticide, Fungicide, and Rodenticide Act of 1948, amended in 1996. In addition, federal land management agencies develop area specific management plans including the 1994 Northwest Forest Plan, and management plans for individual National Forest or Bureau of Land Management units. State laws in the supply base related to watercourse BMPs include: • California: California Forest Practice Act • Idaho: Idaho Forest Practices Act • Montana: Streamside Management Zone Law and Rules • Oregon: Oregon Forest Practices Act • Washington: Washington Forest Practices Act Wyoming does not have a forest practices act, but does publish BMPs for forestland operations. Conclusion Water quality and quantity is maintained or protected by federal and state regulations which are enforced by multiple regulatory agencies. Forest activities on federal lands are assessed under NEPA and follow various management plans. State and private activities follow state-level forest practices regulations or recommended BMPs. Operations on private lands on Wyoming, however, are not legally required to comply with BMPs, and limited data exists on the extent of active compliance. As a result, Specified Risk is assigned pertaining to the procurement of feedstock from private lands in Wyoming. For all other state and private lands, risk is Low. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	Mechanisms & Supporting Evidence The CAA is enforced against both private and federal entities, with \$4.5 billion being assessed in fines, restitution, and court-ordered environmental projects during 2013, nearly \$1 billion of which resulted from violations by federal entities. States do not rely solely on the EPA for enforcement; they typically have their own regulatory bodies which are dedicated to enforcement of SIPs, such as Cleaner Air Oregon and the California Air Resources Board. The provisions enforced by these bodies may even be stricter than those in the CAA. The US Forest Service has an internal team which monitors for CAA compliance on their own lands. Additionally, actions on federal land are also subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. https://www.epa.gov/clean-air-act-overview/air-pollution-current-and-futurechallenges https://www.epa.gov/agriculture/agriculture-and-air-quality https://www.fs.usda.gov/air/law_policy.htm https://sgp.fas.org/crs/misc/RL34384.pdf https://sgp.fas.org/crs/misc/RL34384.pdf https://www.oregon.gov/deq/aq/cao/Pages/default.aspx https://ww2.arb.ca.gov/ https://www.fs.usda.gov/air/index.htm https://academic.oup.com/jof/article/118/4/403/5825558 For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Air emissions can be harmful to both human health and natural environment. It is important to avoid overproduction of air pollutants in feedstock sourcing. 152 Regulations & Enforcement Under the Clean Air Act (CAA), the US Environmental Protection Agency (EPA) established national air quality standards to limit levels of certain pollutants. All states are required to work with the EPA to develop and maintain State Implementation Plans (SIPs) to determine potential causes of air pollution

	and determine appropriate mitigation measures. Forest actions which would affect air quality, such as prescribed fire, are addressed in these SIPs. Under the General Conformity rule of the CAA, federal agencies must also comply with SIPs when performing activities on their own lands. 153 Enforcement of SIPs is typically carried out via fines and/or civil litigation, with the EPA and state agencies working together to prosecute violations. Conclusion The CAA is enforced regularly through cooperation between state and federal agencies. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	Mechanisms & Supporting Evidence Violations of the FIFRA can result in costly fines and imprisonment. Civil litigation by the EPA under this act occurs 2-3 times per year. It is unlikely that Category I substances would be used in a forest setting, as it would be unusual for the EPA to approve the use of such a product for a forest setting where water quality considerations are paramount. Nevertheless, no legislation in the US exists that would explicitly prevent a Category I substance from being used in the production of feedstock on state and private lands. Actions on federal land are subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, such as in Southern Oregon Citizens v. Clark. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. https://www.epa.gov/pesticide-registration/about-pesticide-registration http://www.npic.orst.edu/reg/label.html https://www.cdpr.ca.gov/docs/legbills/calcode/subchpte.htm#a0201 https://ntp.niehs.nih.gov/iccvam/meetings/sot15/paris-poster-text-508.pdf https://www.state.gov/key-topics-office-of-environmental-quality-andtransboundary-issues/stockholm-convention-on-persistent-organicpollutants/ https://www.state.gov/key-topics-office-of-environmental-quality-andtransboundary-issues/rotterdam-convention-on-the-prior-

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Risk Rating justification	Context The treaties and guidelines in this indicator relate to three distinct risks: 1. Risks to human health (WHO, Rotterdam Convention) 2. Risk of pollution by environmentally persistent chemicals (Stockholm Convention) 3. Risk of ozone layer depletion (Montreal Protocol) Regulations & Enforcement Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Environmental Protection Agency (EPA) is responsible for the regulation of pesticides in the US, and they oversee the creation of pesticide labels after evaluating pesticide ingredients, target crops, frequency and timing of use, and storage and disposal practices. It is a violation of federal law to use a pesticide in a manner inconsistent with its labeling. Some states, such as CA, also have their own pesticide labeling rules. The EPA rates the hazard level of a given compound as Category I-IV. WHO 1A and 1B chemicals are equivalent to EPA Category I substances. The US is a signer on the Stockholm Convention and the Rotterdam Convention but has not ratified either of them due to the inability to completely enforce their provisions. Not all substances listed under these treaties are banned in the United States. The US was one of the primary countries which helped draft the Montreal Protocol on Substances that Deplete the Ozone Layer and has ratified it. On federal lands, pesticide use would be subject to review under the National Environmental Policy Act (NEPA). As a result of the Southern Oregon Citizens v. Clark case of 1983, the Forest Service and Bureau of Land Management are required to conduct additional environmental and human health risk assessments pertaining to pesticide use that go beyond FIFRA. Conclusion Pesticide use is regulated under EPA and some state-level regulations on state and private land. On Federal lands use of pesticides is regulated under

	the EPA and for certain projects subject to public review under NEPA. It is unlikely the EPA would approve for forest use a Category I pesticide or a pesticide prohibited by one of the treaties listed in this indicator. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA - https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Mechanisms & Supporting Evidence Violations of hazardous waste disposal laws in the United States can carry severe penalties, including fines, suspension of operations, and imprisonment. Violators are also required to clean up their spills; the RCRA is focused on prevention of the release of hazardous waste, but also contains provisions for remediating hazardous waste spills in the environment. The EPA is transparent in its rigorous enforcement of environmental laws, maintaining a publicly searchable database of violations of federal environmental laws. Finally, in the interest of continuous improvement, the EPA creates new National Enforcement and Compliance Initiatives every three years to tackle the most serious environmental violations. Training Package on EU Waste Legislation - Environment - European Commission (europa.eu) https://www.epa.gov/hwgenerators/typical-wastes-generated-industrysectors https://rcrainfo.epa.gov/rcrainfohelp/application/publicHelp/nationallydefinedvalues/crossmodule/ndvcrossmodulewastecode.htm https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcraregulations https://www.epa.gov/hw/guidance-remediation-waste-management-resourceconservation-and-recovery-act-rcra-corrective https://echo.epa.gov/ https://www.epa.gov/enforcement/national-enforcement-and-complianceinitiatives For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context ‘Waste’ for the purpose of this indicator is ‘any substance or object that the holder discards or intends to discard or is required to discard’. Wood waste and post-harvest residue from forest management activities is separately

	covered under the Indicator 2.2.4. Regulations The US Environmental Protection Agency (EPA) provides lists of common waste products generated by various sectors. The logging industry is not one of the sectors listed, but it shares many processes in common with the heavy construction sector and the equipment repair sector. Of the waste products produced in those sectors, the following could be reasonably expected to be present at a logging operation: • D001 – ignitable waste • D004 – arsenic • D006-D008 – heavy metals • F001-F005 – halogenated and nonhalogenated solvents These codes are associated with the Resource Conservation and Recovery Act (RCRA). The EPA provides guidelines for disposal of these types of wastes. Enforcement of these guidelines can be carried out by the EPA or by state agencies. All states in the supply base have their own divisions or agencies dedicated to the enforcement of hazardous waste laws, and most have their own hazardous waste regulations which are stricter than federal provisions. Conclusion The US Environmental Protection Agency takes the matter of hazardous waste very seriously and enforces the Resource Conservation and Recovery Act through collaboration with state agencies. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence The US Department of Agriculture publishes factsheets on each state which quantify forest gain and loss. In California, Oregon, and Washington, the average annual change in standing wood volumes is positive. In Idaho and Montana, the average annual change in standing wood volumes is negative. In these states losses are mainly due to mortality not harvest removals. Harvest removals are 10% of growth gross in Idaho and 19% of gross growth in Montana. For Wyoming, a separate US Forest Service report showed that harvest in Wyoming is 9% of gross growth. Inventory volume across the state, however, is declining at 3.5% year on average, primarily due to fire and insect mortality.

	https://www.sciencedirect.com/science/article/abs/pii/B978012409548909761X https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=stelprdb5349922 https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2_026990 https://www.blm.gov/about/history/timeline https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/ https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://public.tableau.com/views/FIA_OneClick_V1_2/StateSelection?%3AshowVizHome=no https://www.fs.usda.gov/rm/pubs_series/rmrs/rb/rmrs_rb028.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Sustainable forestry can be defined as “The practice of managing forests to meet current needs and desires of society for forest resources, i.e., products, services, and values, without compromising the availability of these for future generations.” To ensure feedstock sourcing does not jeopardize the availability of forest resources to future generations, harvest levels should not exceed the ability of forests in the supply base to recuperate losses. Regulations Federal lands are subject to regional forest plans, such as the Sierra Nevada Forest Plan in California and the Northwest Forest Plan in Washington and Oregon. These plans ensure for the proper regeneration and maintenance of forest cover during harvest operations. Additionally, in 1976, the Federal Land Policy and Management Act established the policy of retaining lands in federal ownership, meaning that these lands will not be sold to into the hand of private owners who may decline to maintain forest proper forest inventories. Laws relevant to this indicator which apply to state and private lands in the supply base include: • California Forest Practice Act • Idaho Forest Practices Act • Oregon Forest Practices Act • Washington Forest Practices Act Each of these laws require that land be regenerated to ecologically sound stocking levels after harvest, unless being converted to non-forest use. Conclusion

	States in the supply base are either increasing in standing volumes, or slightly decreasing in standing volumes. The decreases that exist are accountable to fire and insect mortality, rather than unsustainable harvest levels. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Harvested areas shall be regenerated Mechanisms & Supporting Evidence Actions on federal land are also subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The California, Oregon, and Washington forest practice acts require the creation of harvest plans which require regeneration for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of state BMPs carry harsh penalties in Idaho, while compliance is voluntary in Montana. Regardless, recent audits in both found compliance exceeding 98%. While use of BMPs on Wyoming state lands is mandatory, on Wyoming private lands it is voluntary, with limited data available on levels of compliance. However, natural regeneration is a normal ecological component of Wyoming forests, meaning that a lack of BMP implementation would not necessarily prevent regeneration. All six states are actively engaged in updating and revising their BMPs to keep up with changing attitudes and scientific research. The US Department of Agriculture publishes factsheets on each state which quantify forest gain and loss. Of the states in the supply base, California, Oregon, and Washington show a small net loss of forested acreage on an average year, while Idaho and Montana show small net increases. All states in the supply base convert some acres out of forest use each year. https://ourworldindata.org/world-lost-one-third-forests https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=stelprdb5349922 https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2_026990 https://www.blm.gov/about/history/timeline https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-

	californiaforest-practice-rules/ https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://wsfd.wyo.gov/forest-management/bmp-s https://academic.oup.com/jof/article/118/4/403/5825558 https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf https://drive.google.com/file/d/14gKwFYAW9EM5cl5ASDGtjb5oazwpmLFt/view?usp=sharing https://www.fs.usda.gov/rm/pubs_series/rmrs/rb/rmrs_rb028.pdf https://public.tableau.com/views/FIA_OneClick_V1_2/StateSelection?%3AshowVizHome=no For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Historically, harvest of forest products has contributed to decreasing forest cover and forest biomass worldwide. Harvest levels of feedstock should not contribute to deforestation. Regulations Federal lands are subject to regional forest plans, such as the Sierra Nevada Forest Plan in California and the Northwest Forest Plan in Washington and Oregon. These plans ensure for the proper regeneration and maintenance of forest cover during harvest operations. Additionally, in 1976, the Federal Land Policy and Management Act established the policy of retaining lands in federal ownership, meaning that these lands will not be sold to into the hand of private owners who may decline to maintain forest cover. Laws relevant to this indicator which apply to state and private lands in the supply base include: • California Forest Practice Act • Idaho Forest Practices Act • Montana Forestry Best Management Practices Notification Law • Oregon Forest Practices Act • Washington Forest Practices Act Wyoming does not have forest practice laws but does publish BMPs for forestland operations. The Montana law requires that operators be informed of BMPs prior to beginning operations. BMPs for both Wyoming and Montana include reforestation recommendations. Meanwhile, California, Idaho, Oregon, and Washington laws require that land be regenerated to ecologically sound stocking levels after harvest, unless being converted to non-forest use. Notably, none of these states have provisions prohibiting the conversion of private lands to non-forest use. Land which is converted for commercial or residential development

	would not be regenerated. This issue is covered separately in Indicator 2.2.1. Conclusion All lands in the project area that are maintained in forest are likely to be regenerated after feedstock harvesting, whether due to federal policies, state laws, or natural processes. However, intentional conversion of stands out of forest use does occur on private lands throughout the project area. Specified risk is assigned pertaining to the possibility of harvesting feedstock from lands that have been converted out of forest use. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Mechanisms & Supporting Evidence The US Forest Service has consistently produced annual reports of forest health monitoring since 2001. From an implementation standpoint, the Biden-Harris administration has appropriated \$930 million dollars to wildfire risk reduction efforts on national forest lands. State governments have similarly made good on their commitments from a monetary perspective, with \$80 million in California Forest Health grant-funded projects being implemented in 2022 alone. It remains to be seen whether these programs will be effective in achieving their goals. https://www.nifc.gov/fire-information/statistics/wildfires https://www.cnn.com/2022/02/23/world/wildfire-increase-climate-changeunep-report/index.html https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd497042.pdf https://www.fs.usda.gov/foresthealth/protecting-forest/forest-healthmonitoring/index.shtml https://www.fs.usda.gov/sites/default/files/media/types/publication/field_pdf/increasing-pace-restoration-job-creation-2012.pdf https://www.fsa.usda.gov/programs-and-services/disaster-assistanceprogram/emergency-forest-restoration/index https://foresthealthtracker.dnr.wa.gov/About/monitoring https://www.idl.idaho.gov/about-forestry/insects-and-disease/ https://www.oregon.gov/odf/board/bofarchives/20180724/BOFATTCH_20180724_9_01%20-%20Draft%20FMP%20Guiding%20Principles.pdf https://dnrc.mt.gov/Forestry/Forest-Management/montana-forest-action-plan

	https://www.fire.ca.gov/what-we-do/grants/forest-health https://www.dnr.wa.gov/news/dnr-awards-16-million-forest-restorationgrants-forest-collaboratives-washington https://www.fs.usda.gov/foresthealth/publications/fhm/fhm-annual-nationalreports.shtml https://www.usda.gov/media/press-releases/2023/01/19/biden-harrisadministration-launches-new-efforts-address-wildfire https://www.caclimateinvestments.ca.gov/forest-health For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Wildfires are a major part of many ecosystems in the supply base. Wildfire frequency and size have been increasing steadily since reporting began in 1983. Intensity of fires has also increased. Meanwhile, bark beetles are a major cause of mortality in forests, with an estimated 25 million trees killed in California in 2015 alone. A variety of outbreak beetle species are present in the supply base including spruce beetle, mountain pine beetle, and pinyon ips beetle. Regulations & Enforcement The federal government handles natural processes such as insects and disease through monitoring, by managing their own lands, and by providing grants. The Forest Health Monitoring program from the US Forest Service is a national program designed to determine the status, changes, and trends in indicators of forest condition on an annual basis. The Forest Service estimated that in 2012, 65-82 million acres of its lands required restoration, and the organization set a goal of increasing mechanical treatment restoration on its lands by 20% over the following three years. The agency also provides grants to private landowners who wish to manage the impacts of wildfire and insect damage through programs such as Emergency Forest Restoration Program (EFRP). States also participate in responding to the impacts of insects and disease via monitoring, management of their own land, and disbursement of grants. Examples of monitoring include the Washington State Forest Health Monitoring Program and the Idaho Department of Lands Forest Health Program. Examples of state land management are Oregon Forest Management Plan and the Montana Forest Action Plan. Finally, grant programs available to non-state landowners from state entities include CALFIRE Forest Health Grants and Washington All Lands Forest Restoration Program Conclusion Even though resolving the issues associated with insect outbreaks and fires is exceedingly difficult, a variety of programs exist on the state and federal level which can manage their impacts. Low risk is assigned on all land types in the supply base.

	For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	Mechanisms & Supporting Evidence Based on our research, no projects are currently underway to produce genetically modified trees for timber production which would be used in any of the states in the supply base. If any such organism were to be produced by scientists or industry members, it would take at least 3 years for it to be approved by the relevant regulatory bodies, with approval more commonly taking up to 13 years. https://bch.cbd.int/protocol/text/ https://www.nytimes.com/2023/02/16/science/genetically-modified-treesliving-carbon.html https://www.esf.edu/chestnut/ https://www.forbes.com/sites/gmoanswers/2015/12/21/how-are-gmosregulated/?sh=1e3b770b6255 For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Article 1 of the Cartagena Protocol on Biosafety states the following in relation to genetically modified organisms: In accordance with the precautionary approach contained in Principle 15 of the Rio Declaration on Environment and Development, the objective of this Protocol is to contribute to ensuring an adequate level of protection in the field of the safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements. In accordance with this concept, the SBP has determined that genetically modified organisms shall not be used for biomass feedstock. Regulations & Enforcement Genetically modified organisms (GMOs) are regulated by three different agencies in the US federal government: the US Food and Drug Administration (FDA), the US Environmental Protection Agency (EPA), and the USDA Animal and Plant Health Inspection Service (APHIS). GMOs are typically used for food production, rather than wood fiber production, but

	research into creating GMO trees for wood fiber is ongoing. One notable example includes the company Living Carbon, who, prior to recent legislative changes which tightened measures for GMO review, received approval to plant their genetically modified poplars in the Southeastern US. Another example is the research into creating a blight resistant American chestnut and restoring this species to the forests of the Northeastern US. These trees are currently pending government approval. Conclusion Due to the strict regulatory framework in the US around genetically modified organisms, and the lack of active research on the production of genetically modified trees for wood fiber production, Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	Mechanisms & Supporting Evidence In May of 2021, the US Department of Agriculture published the ClimateSmart Agriculture and Forestry Strategy: 90-Day Progress Report. This report outlined a 7-step plan to achieve the goals outlined in the NDC pertaining to CSAF: • Prepare the USDA to quantify, track, and report the benefits of CSAF activities • Develop a CSAF strategy that works for all farmers, ranchers, forest landowners, and communities • Leverage existing USDA programs to support CSAF strategies • Strengthen education, training, and technical assistance for CSAF practices

	• Support new and better markets for agriculture and forestry products generated through CSAF practices • Develop a forest and wildfire resilience strategy • Improve research https://unfccc.int/topics/land-use/workstreams/land-use--land-use-changeand-forestry-lulucf https://www.state.gov/the-united-states-officially-rejoins-the-parisagreement/ https://unfccc.int/sites/default/files/NDC/202206/United%20States%20NDC%20April%2021%202021%20Final.pdf https://www.usda.gov/sites/default/files/documents/climate-smart-ag-forestrystrategy-90-day-progress-report.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context The Intergovernmental Panel on Climate Change (IPCC) has stated that the Land Use, Land-Use Change and Forestry (LULUCF) sector "...offers significant near-term mitigation potential while providing food, wood and other renewable resources as well as biodiversity conservation." Feedstock sourcing is part of the LULUCF sector, making it important to track its contributions to carbon emissions. Regulations & Enforcement The US accounts for its LULUCF emissions via Route A. The US rejoined the Paris Agreement in February of 2021 and its Nationally Determined Contribution (NDC) filed with the UNFCCC states that "climate smart agriculture and forestry" (CSAF) can help deliver on the goals of the NDC. Conclusion The US fulfills all the criteria outlined in Route A of this indicator and has taken meaningful steps to fulfill its obligations outlined in its NDC. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would

	otherwise be lost or to assist regeneration.
Supply Base Verifiers	Mechanisms & Supporting Evidence The US Department of Agriculture publishes factsheets on each state which quantify forest gain and loss. Increasing carbon stocks are closely associated with increased forest biomass. In California, Oregon, and Washington, the average annual change in standing wood volumes is positive. In Idaho and Montana, the average annual change in standing wood volumes is negative. In these states losses are mainly due to mortality not harvest removals. Harvest removals are 10% of growth gross in Idaho and 19% of gross growth in Montana. For Wyoming, a separate US Forest Service report showed that harvest in Wyoming is 9% of gross growth. Inventory volume across the state, however, is declining at 3.5%/year on average, primarily due to fire and insect mortality. https://www.nature.com/articles/s41558-020-00976-6 https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=stelprdb5349922 https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2_026990 https://www.blm.gov/about/history/timeline https://pubmed.ncbi.nlm.nih.gov/21939033/ https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/ https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://www.fs.usda.gov/ccrc/topics/management-forest-carbon-stocks https://public.tableau.com/views/FIA_OneClick_V1_2/StateSelection?%3AshowVizHome=no https://www.fs.usda.gov/rm/pubs_series/rmrs/rb/rmrs_rb028.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Forests provide a massive carbon sink, absorbing an estimated net 7.6 billion gigatons of CO2 equivalents annually. Utilizing forest biomass for energy, however, can substitute for other fuel sources, while maintaining current stored carbon in forests. It is therefore critical that harvest activity on the landscape is maintained at a level that allows forests to sustain their carbon stocks. Option A. Feedstock may be sourced from supply bases where an assessment shows that the forest carbon stocks are stable or increasing. Option B. If the assessment shows that the forest carbon stocks are declining

	in the supply base, feedstock may be sourced if the decline is due to natural processes (fire, pests etc.) and sourcing of feedstock does not contribute to the carbon loss and may contribute to a faster regeneration of the forest. Regulations No laws exist in the supply base which pertain specifically to the maintenance of carbon stocks. There are, however, regulations which help maintain forest vitality on the landscape level. For example, federal lands are subject to regional forest plans, such as the Sierra Nevada Forest Plan in California and the Northwest Forest Plan in Washington and Oregon. These plans are designed with the intention of properly maintaining, regenerating, and enhancing federal forests through responsible, ecologically sound management strategies. Additionally, in 1976, the Federal Land Policy and Management Act established the policy of retaining lands in federal ownership, meaning that these lands will not be sold to into the hand of private owners who may decline to maintain forest cover, and therefore reduce carbon stocks. Generally, ecologically sound forest management will lead to maintaining or increasing carbon stocks. State laws in the supply base which encourage—and often mandate—ecologically sound forest management practices include: • California Forest Practice Act • Idaho Forest Practices Act • Montana Forestry Best Management Practices Notification Law • Oregon Forest Practices Act • Washington Forest Practices Act Conclusion California, Oregon, and Washington are increasing in forest carbon stocks, satisfying Option A. Idaho, Montana, and Wyoming are slightly decreasing in forest carbon stocks, but this decrease is almost entirely accountable to wildfire and insects, satisfying Option B. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence Actions on federal land are subject to review under NEPA. NEPA is enforced

	via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. The California, Oregon, and Washington forest practice acts mandate the creation of harvest plans which require regeneration for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of state BMPs carry harsh penalties in Idaho, and recent audits found compliance exceeding 98%. While use of reforestation BMPs on Wyoming and Montana state lands is mandatory, it is voluntary on private lands in these states, with limited data available on levels of compliance. All six states are actively engaged in updating and revising their BMPs to keep up with changing attitudes and scientific research. https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=stelprdb5349922 https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2_026990 https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/ https://www.idl.idaho.gov/about-forestry/forest-practices-act/ https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://wsfd.wyo.gov/forest-management/bmp-s https://academic.oup.com/jof/article/118/4/403/5825558 https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf https://drive.google.com/file/d/14gKwFYAW9EM5cl5ASDGtjb5oazwpmLFt/view?usp=sharing https://dnrc.mt.gov/TrustLand/about/planning-and-reports For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context For the purposes of this supply base evaluation, we will meet the criteria for this indicator using Option B. Many states in the supply base have legal requirements that harvested forests be regenerated. If a forest is difficult to regenerate, harvest of that forest would implicitly violate local forest practice rules. Regulations Federal lands are subject to regional forest plans, such as the Sierra Nevada Forest Plan in California and the Northwest Forest Plan in Washington and Oregon. These plans ensure for the proper regeneration and maintenance of forest cover during harvest operations. The plans are written based on the

	most ecologically sound science available, and it is unlikely that a harvest proposed on a low productivity site would be in compliance with these plans. Laws relevant to this indicator which apply to state and private lands in the supply base include: • California Forest Practice Act • Idaho Forest Practices Act • Montana Forestry Best Management Practices Notification Law • Oregon Forest Practices Act • Washington Forest Practices Act Wyoming does not have forest practice laws but does publish BMPs for forestland operations. The Montana law requires that operators be informed of BMPs prior to beginning operations. BMPs for both Wyoming and Montana include reforestation recommendations. Meanwhile, California, Idaho, Oregon, and Washington laws require that lands be regenerated to ecologically sound stocking levels after harvest. Notably, none of these states have provisions prohibiting the conversion of private lands to non-forest use. Conversion of land for commercial or residential development could occur on low productivity sites. However, this issue is covered separately in Indicator 2.2.1. Conclusion Federal agencies follow regional forest plans which are meant to ensure ecologically sound forestry and would not permit harvest from low-productive areas on federal lands. Meanwhile, California, Idaho, Oregon, and Washington have laws that require regeneration of forests after harvest, which would make harvest from areas that are difficult to regenerate a violation of state law. Montana and Wyoming do not have regulations in place which pertain to the harvest of feedstock from low productivity sites on private lands. Specified risk that feedstock procured from private lands in Wyoming and Montana could be sourced from low productivity sites. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf Specified Risk
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
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).
Supply Base Verifiers	Mechanisms & Supporting Evidence

	Actions on federal land are subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process. It is therefore unlikely that any HCS forests would be harvested on federal lands. Meanwhile, if easements are violated on protected private lands, financial penalties are typically levied. However, the vast majority of HCS forests on private lands are not held in conservation easements. Moreover, data on which forests are within the 90th-100th percentile of above ground carbon in the United States are not publicly available, so private landowners may not know if forests under their ownership meet these characteristics. Despite the apparent lack of regulation, data on harvest activities on different aged forests available from the Forest Inventory & Analysis Program (FIA) are promising for this indicator. FIA has kept a continuous coarse inventory of the country's forests since 1930. According to the FIA's data portal (EVALIDator), harvest on forests aged over 190 years old comprises less than 1% of all harvest in California, Idaho, Montana, Oregon, and Washington. Forests over 190 years old could be either primary (first rotation) or secondary, but forests younger than this would be entirely secondary. These data are not available for Wyoming, however it is highly unlikely that forests in Wyoming would comprise the 90 – 100 percentile on the supply base; such stands would likely be in the coastal regions of Oregon, Washington, or Northern California. During their USA national risk assessment, the Forest Stewardship Council (FSC) identified a number of areas in the supply base which contain old growth forests (Figure 4). These could either be unlogged forests or logged forests that retain late successional characteristics & considered as HCV. The rarity of harvest of forests exceeding 190 years in age demonstrated by EVALIDator data suggests that feedstock is highly unlikely to be sourced from these forests, despite their presence in the supply base. Additionally, the FSC did not include a provision in their assessment that these forests must contain aboveground carbon in the 90th percentile, making it distinct from the assessment for this indicator. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Forests with High Carbon Stock (HCS) & High Conservation Value (HCV) provide a variety of unique ecosystem services, including to biodiversity and carbon storage. Feedstock sourcing should not degrade these rare

	ecosystems, particularly in the United States, where historic logging activities have impacted the vast majority of existing forests. In the context of this indicator, High Carbon Stocks are inferred as forests in the top 10% of carbon stocks in the supply base. Regulations & Enforcement Regional forest plans (such as the Sierra Nevada Forest Plan in California and the Northwest Forest Plan in Washington and Oregon) may decrease the likelihood that these forests would be harvested on federal lands, though they do not outright prohibit it. Meanwhile, private and state lands in the supply base also do not contain explicit protections for HCS. Some forests on private lands are protected by conservation easements which may permanently prohibit harvesting or other activities. These easements are voluntary agreements between landowners and federal or state governments, typically in exchange for tax benefits or cost share funds. Conclusion While legal protections of HCS forests are somewhat limited, harvest on forests which might meet the SBP definition of combined areas of HCS & HCV are rare. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	Mechanisms & Supporting Evidence This provides a financial incentive for landowners not to divert production away from long-lived wood products. Beyond this, the characteristics of the supply base make non-compliance with this indicator highly unlikely. Firstly, existing pulp mills in Idaho, Oregon, and Washington acquire their supply primarily from sawmill residuals. Throughout the United States, sawtimber prices are consistently higher than pulpwood prices. The BP would be able to source material in a similar manner. Secondly, forests of Idaho, Montana, and Wyoming are currently in crisis of overstocking which has led to mass mortality from bark beetle outbreaks. Similarly, California is overwhelmed with an overabundance of small diameter trees which serve as fuel for wildland fires. In 2015, this led the governor to issue a State of Emergency related to tree mortality in which he emphasized the need to create markets for these highly hazardous fuels. Feedstock sourcing in these four states would likely involve removing the smaller trees in overstocked forests. If such trees were

	not harvested for feedstock, their eventual fate would likely be mortality from beetles and wildfire, rather than harvest into long-lived forest products. https://www.pnas.org/doi/10.1073/pnas.1904231116 https://extension.psu.edu/valuing-standing-timber https://timberupdate.com/timber-prices/ https://www.forest2market.com/blog/wood-chip-supplies-diminish-and-pricessoar-in-the-pacific-northwest https://www.idahoforests.org/content-item/how-paper-is-made-2/ https://www.doi.gov/ocl/hearings/111/MountainPineBeetle_061609 https://academic.oup.com/bioscience/article/68/2/77/4797261 https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M369/K025/369025258.PDF For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	In addition to their economic benefits, long lived forest products such as sawtimber can be a large carbon sink. Feedstock harvest should not divert from the growth and harvest of such products. Regulations There are no laws or regulations in the supply base pertaining to this indicator. Conclusion Ample supply of low-grade material in overstocked forests exists in the supply base. In areas where this is not the case, mill residuals form the backbone of the current pulpwood supply. Finally, strong financial incentives exist for landowners to allow their trees to mature into long-lived forest products when possible. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Mechanisms & Supporting Evidence The NLRB regularly reviews cases of alleged violations of the National Labor Relations Act and keeps an active public log of rulings. The US Department of Labor is also active in promoting workers' awareness of their own rights. Currently, approximately 10% of American workers are members of collective

	bargaining organizations. Often, these organizations agree to resolve disputes with their employers through private arbitration, rather than via the NLRB. The American Arbitration Association has developed a set of standards for mediating such disputes. https://www.ilo.org/empent/areas/businesshelpdesk/WCMS_DOC_ENT_HLP_FOA_EN/lang--en/index.htm https://www.dol.gov/agencies/ilab/our-work/diplomacy/ilo https://www.ilo.org/declaration/lang--en/index.htm https://www.law.cornell.edu/constitution-conan/amendment-1/freedom-ofassociation-overview https://www.nlr.gov/about-nlr/who-we-are https://www.nlr.gov/cases-decisions/cases/cases-and-organizationsinterest?organization=Bridgewater%20Associates https://www.dol.gov/general/workcenter/know-your-rights-toolkit https://www.bls.gov/news.release/union2.nr0.htm https://www.adr.org/sites/default/files/Labor_Arbitration_Rules_3.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context The International Labour Organization (ILO) states that freedom of association (the right of workers to join organizations of their choosing) and collective bargaining (the means through which employers and their trade organizations can establish fair working conditions) are fundamental human rights. Feedstock sourcing should not violate these rights. Regulations & Enforcement The United States is a member of the ILO, which adopted the Declaration on Fundamental Principles and Rights at Work in 1998. As an ILO Member State, the United States is committed to respecting and promoting the principles and rights outlined in the 1998 Declaration, which pertain to: (1) freedom of association and the effective recognition of the right to collective bargaining; (2) the elimination of forced or compulsory labor; (3) the abolition of child labor; and (4) the elimination of discrimination in respect of employment and occupation. The rights of freedom of association and collective bargaining are protected in the United States. Freedom of association is enshrined in the 1st Amendment to the US Constitution. Meanwhile, the National Labor Relations Act of 1935 gives workers the right to collective bargaining, defined as “The right to bargain collectively with your employer through a representative that you and your coworkers choose.” This right is protected by the National Labor Relations Board (NLRB), which is tasked with remedying unfair labor practices committed by private sector employers and unions. Conclusion

	Rights to freedom of association and collective bargaining are clearly outlined in law, and employees have multiple avenues to resolve disputes with their employers. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	Mechanisms & Supporting Evidence Reports of forced labor are investigated extensively by a variety of law enforcement agencies. For example, Federal Bureau of Investigation field offices almost invariably contain Child Exploitation and Human Trafficking Task Forces. Immigration and Customs Enforcement has more than 6,000 agents dedicated exclusively to investigating cases of forced labor. The Department of Justice regularly prosecutes human trafficking cases, with convictions secured against 309, 475, and 526 convictions secured against traffickers in 2020, 2019, and 2018, respectively. gri-409-forced-or-compulsory-labor-2016.pdf (globalreporting.org) https://www.dol.gov/agencies/ilab/our-work/diplomacy/ilo https://www.ilo.org/declaration/lang--en/index.htm https://www.justice.gov/crt/involuntary-servitude-forced-labor-and-sextrafficking-statutes-enforced https://www.dol.gov/agencies/ilab/our-work/child-forced-labor-trafficking https://www.fbi.gov/investigate/violent-crime/human-trafficking https://www.dhs.gov/sites/default/files/publications/ice__forced_labor_and_forced_child_labor_1.pdf https://www.state.gov/reports/2021-trafficking-in-persons-report/unitedstates/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	According to GRI 409, forced and compulsory labor are severe violations of human rights which perpetuate deleterious economic conditions worldwide. The most extreme versions of forced and compulsory labor include slavery and debt bondage, but less extreme examples include withholding identity papers or compelling workers to work extra hours under threat of employment termination. Regulations & Enforcement The United States is a member of the International Labour Organization (ILO), the United Nations organization that adopted the Declaration on

	Fundamental Principles and Rights at Work in 1998. As an ILO Member State, the United States is committed to respecting and promoting the principles and rights outlined in the 1998 Declaration, which pertain to: (1) freedom of association and the effective recognition of the right to collective bargaining; (2) the elimination of forced or compulsory labor; (3) the abolition of child labor; and (4) the elimination of discrimination in respect of employment and occupation. Specific laws in the US can be found in Chapter 77 of the US Code, which states that it is unlawful to hold a person in slavery, forced labor, or involuntary servitude. Additionally, Section 1592 specifically prohibits the seizure of documents to force others to work. The Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) in the Department of Labor coordinates the enforcement of these laws across dozens of different law enforcement agencies, particularly within the Department of Defense, Department of State, and Department of Justice. Conclusion With a robust set of laws preventing forced labor and a variety of law enforcement agencies acting in individually and in concert to investigate and prosecute cases of forced labor, Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Mechanisms & Supporting Evidence If an employer willfully violates the child labor rules, the FLSA allows for fines up to \$10,000. If a second offense is committed after a conviction for a first offense, an individual may face imprisonment. The US Department of Labor actively prosecutes child labor law violations: in 2021, a total of 2,819 minors were found to be employed in violation of law across the US, and their employers were fined a collective \$3.4 million. Enforcement of state law is conducted by local law enforcement and regulatory agencies. https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm https://www.dol.gov/agencies/ilab/our-work/diplomacy/ilo https://www.ilo.org/declaration/lang--en/index.htm https://www.dol.gov/agencies/whd/child-labor https://www.dol.gov/agencies/whd/fact-sheets/40-child-labor-farms https://www.dir.ca.gov/DLSE/ChildLaborLawPamphlet.pdf https://www.labor.idaho.gov/dnn/Businesses/Idaho-Labor-Laws https://erd.dli.mt.gov/labor-standards/child-labor-law/child-labor-

	lawreference-guide https://www.oregon.gov/boli/employers/Pages/child-labor-summaries.aspx https://www.lni.wa.gov/workers-rights/youth-employment/how-to-hire-minors https://dws.wyo.gov/dws-division/labor-standards/ https://www.legalmatch.com/law-library/article/child-labor-law-violations.html https://www.dol.gov/newsroom/releases/whd/whd20220729 For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	According to the International Labour Organization (ILO), “Child labor is a violation of fundamental human rights and has been shown to hinder children’s development, potentially leading to lifelong physical or psychological damage.” Child labor is incompatible with SBP values. Regulations & Enforcement The United States is a member of the ILO, the United Nations organization that adopted the Declaration on Fundamental Principles and Rights at Work in 1998. As an ILO Member State, the United States is committed to respecting and promoting the principles and rights outlined in the 1998 Declaration, which pertain to: (1) freedom of association and the effective recognition of the right to collective bargaining; (2) the elimination of forced or compulsory labor; (3) the abolition of child labor; and (4) the elimination of discrimination in respect of employment and occupation. Specific laws regarding child labor in the United States are outlined in the Fair Labor Standards Act of 1938. This law sets standards for youth employment in agricultural work (which feedstock sourcing is included in). They are as follows: • Youths ages 16 and above may work in any farm job at any time. • Youths aged 14 and 15 may work outside school hours in jobs not declared hazardous by the Secretary of Labor. • Youths 12 and 13 years of age may work outside of school hours in non-hazardous jobs on farms that also employ their parent(s) or with written parental consent. • Youths under 12 years of age may work outside of school hours in nonhazardous jobs with parental consent, but only on farms where none of the employees are subject to the minimum wage requirements of the FLSA. • Local youths 10 and 11 may hand harvest short-season crops outside school hours for no more than 8 weeks between June 1 and October 15 if their employers have obtained special waivers from the Secretary of Labor. • Youths of any age may work at any time in any job on a farm owned or operated by their parents. Additionally, all six states within the supply base have their own laws which place additional restrictions and regulations on child labor. Conclusion With a robust set of laws preventing forced labor and a variety of law

	enforcement agencies acting in individually and in concert to investigate and prosecute cases of forced labor, Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	Regulations & Enforcement The US Equal Employment Opportunity Commission (EEOC) enforces several laws pertaining to employment discrimination, including: • Title VII of the Civil Rights Act of 1964 • The Pregnancy Discrimination Act • The Equal Pay Act of 1963 • Title I of the Americans with Disabilities Act of 1990 • Sections 501 and 505 of the Rehabilitation Act of 1973 • The Age Discrimination in Employment Act of 1967 (ADEA) • Title II of The Genetic Information Nondiscrimination Act of 2008 (GINA), Collectively, these laws prohibit discrimination by employers on the basis of race, color, religion, sex, pregnancy, sexual orientation, gender identity, disability, age, or genetic information. Discrimination includes all types of less favorable treatment, such as employment denial, harassment, demotion, termination, retaliation, or decreased compensation. https://www.ilo.org/global/topics/equality-and-discrimination/lang-en/index.htm https://www.eeoc.gov/youth/what-laws-does-eeoc-enforce https://www.dol.gov/sites/dolgov/files/ofccp/regs/compliance/factsheets/FAC T_Workplace_Aug2016_ENGESQA508c.pdf https://www.justia.com/employment/employment-discrimination/eeoc/ https://www.eeoc.gov/newsroom/eeoc-releases-fiscal-year-2020enforcement-and-litigation-data https://www.eeoc.gov/training-institute For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context According to the International Labour Organization (ILO), employment discrimination has wide social and economic consequences. Fiber sourcing can be a part of the fight to prevent this violation of rights. Regulations & Enforcement

	The US Equal Employment Opportunity Commission (EEOC) enforces several laws pertaining to employment discrimination, including: • Title VII of the Civil Rights Act of 1964 • The Pregnancy Discrimination Act • The Equal Pay Act of 1963 • Title I of the Americans with Disabilities Act of 1990 • Sections 501 and 505 of the Rehabilitation Act of 1973 • The Age Discrimination in Employment Act of 1967 (ADEA) • Title II of The Genetic Information Nondiscrimination Act of 2008 (GINA), Collectively, these laws prohibit discrimination by employers on the basis of race, color, religion, sex, pregnancy, sexual orientation, gender identity, disability, age, or genetic information. Discrimination includes all types of less favorable treatment, such as employment denial, harassment, demotion, termination, retaliation, or decreased compensation. Conclusion Employment discrimination is an issue the United States has consistently strengthened its attitudes towards, with multiple pieces of legislation passed between 1964 and 2008. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	Mechanisms & Supporting Evidence Multiple layers of protection against minimum wage violations exist. These violations can be reported to both the federal Department of Labor (DOL) as well as individual departments of labor for each state. The DOL is also active in promoting workers' awareness of their own rights. Nevertheless, according to the Economic Policy Institute, 4% of non-exempt workers in the United States are victims of wage theft annually, with a \$15 billion gap between legally mandated pay levels and actual wages. This is a relatively low rate of wage theft compared to the global average for all sectors of 15%. In the agriculture, forestry, and fishing sector of the United States, of which feedstock sourcing is a part, the rate of violation is 9%. https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/--publ/documents/publication/wcms_762534.pdf https://www.dol.gov/general/topic/wages/minimumwage https://www.dol.gov/agencies/whd/mw-consolidated https://www.dol.gov/sites/dolgov/files/WHd/legacy/files/ReforestEnglish.pdf https://www.dol.gov/agencies/whd/contact/complaints

	https://www.dol.gov/general/workcenter/know-your-rights-toolkit https://www.epi.org/publication/employers-steal-billions-from-workers-paychecks-each-year/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Minimum wages exist in 90% of International Labour Organization (ILO) member states. Globally, an estimated 327 million workers earn below the minimum wage in their municipality, either due to noncompliance or lack of applicability of laws. Often, agricultural workers are excluded from minimum wage laws, making this indicator specifically relevant to feedstock sourcing. Regulations & Enforcement The Fair Labor Standards Act (FLSA) establishes the federal minimum wage in the United States as \$7.25/hr. This applies to workers in all states is \$7.25/hr. States in the supply base with a higher minimum wage include California, Montana, Oregon, and Washington, which have minimum wages of \$15.50/hr, \$9.95/hr, \$13.50/hr, and \$15.74, respectively. Additionally, the Migrant and Seasonal Agricultural Worker Protection Act (MSPA) has specific provisions which protect workers who have temporarily immigrated to the United States to carry out reforestation efforts. These regulations protect both minimum wage and fair working hours standards. Conclusion There are both federal- and state-level safeguards against minimum wage violations. Additionally, independent findings from Economic Policy Institute suggest wage theft in the US is significantly lower than global averages. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	Mechanisms & Supporting Evidence Multiple layers of protection against overtime pay law violations exist. These violations can be reported to both the federal Department of Labor (DOL) as well as individual departments of labor for each state. The DOL is also active in promoting workers' awareness of their own rights. Nevertheless, according to the Economic Policy Institute, 4% of non-exempt workers in the United States are victims of wage theft annually, with a \$15 billion gap between legally mandated pay levels and actual wages. This is a relatively low rate of wage

	theft compared to the global average for all sectors of 15%. In the agriculture, forestry, and fishing sector of the United States, of which feedstock sourcing is a part, the rate of violation is 9%. https://www.ilo.org/empent/areas/businesshelpdesk/WCMS_DOC_ENT_HLP_TIM_EN/lang--en/index.htm https://www.dol.gov/agencies/whd/flsa/off-the-clock https://webapps.dol.gov/elaws/whd/flsa/screen75.asp?_ga=2.87167324.571397443.1680546578-1478575044.1678819561 https://www.dir.ca.gov/dlse/FAQ_Overtime.htm https://www.oregon.gov/boli/employers/Pages/overtime.aspx https://lni.wa.gov/workers-rights/_docs/esa1.pdf https://www.dol.gov/agencies/whd/contact/complaints https://www.dol.gov/general/workcenter/know-your-rights-toolkit https://www.epi.org/publication/employers-steal-billions-from-workerspaychecks-each-year/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NF-FOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	According to the International Labour Organization (ILO), excessive hours of work can damage workers' health and increase the risk of on-the-job accidents. It is therefore important that workers employed in feedstock sourcing comply with legal requirements for fair working hours. Regulations & Enforcement A standard work week in the United States is 40 hours, and the Fair Labor Standards Act (FLSA) establishes that non-exempt employees receive overtime pay, consisting of not less than one-and-a-half times their normal hourly wage, for any hours worked beyond the standard 40. A specific exemption to this rule is carved out for forestry employees employed at firms with less than 9 workers, which would apply to many companies involved in harvesting feedstock. This exemption is overridden by state laws in CA, OR, and WA. Conclusion There are both federal- and state-level safeguards against overtime violations. Additionally, independent findings from Economic Policy Institute suggest wage theft in the US is significantly lower than global averages. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	Mechanisms & Supporting Evidence In addition to the FMLA, the Bureau of Labor Statistics reports that 77% of private industry workers have a paid sick leave program through their employer, as do 92% of federal and state government workers. The report also stated that employers provide life insurance to 57% of private industry workers and 83% of state and federal workers. Disability insurance is provided to approximately 40% of workers. Life insurance and disability insurance are also readily available on the open market in the United States. Finally, health insurance is made available through an employer to 74% of private industry employees and 93% of government employees. For those who cannot get health provisions through their employer, other options exist through the government or through private entities. Finally, those who cannot afford to pay for health provisions are typically covered under Medicaid or the Children's Health Insurance Program. https://www.ilo.org/global/topics/geip/lang--en/index.htm https://www.paychex.com/articles/employee-benefits/employee-benefits-a-company-must-provide https://www.findlaw.com/smallbusiness/business-taxes/penalties-for-violating-federal-employment-tax-rules.html https://meetbeagle.com/resources/post/401-k-match https://www.calsavers.com/ https://www.oregonsaves.com/ https://www.dol.gov/agencies/whd/agriculture/h2a https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/H2AEnglish.pdf https://www.dol.gov/agencies/whd/fmla https://www.bls.gov/news.release/pdf/ebs2.pdf https://www.healthcare.gov/ https://www.joincrowdhealth.com/ https://www.medicaid.gov/medicaid/eligibility/index.html For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	According to the International Labour Organization, employers have an obligation to mitigate the risk and effects of workplace injuries. Fulfilling this obligation means that workers must have access to healthcare, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation. Regulations & Enforcement In the United States, employers are legally required to provide unemployment insurance and workers' compensation insurance. Additionally, all employers contribute to Social

	Security and Medicare, which are federal programs that provide healthcare and monetary benefits to retirees. This is known as ‘employment tax’ and is overseen by the Internal Revenue Service. Failure by an employer to pay into Social Security and Medicare can result in costly penalties. Approximately 56% of companies also assist their employees in setting up retirement accounts, known as ‘401k’ accounts. California and Oregon mandate that a 401k or similar account be created for most employees. H2-A visas are provided to agricultural migrant workers who temporarily reside in the US to complete a work contract. Employers must guarantee that the worker will be paid for at least 75% of the hours specified in the contract, even if terminated early. Employers still pay into workers’ compensation insurance pools for H2-A workers. For sickness benefits, the Family and Medical Leave Act (FMLA) requires that most employers to provide 12-weeks of unpaid, job protected leave for serious health conditions or for care of a newborn child. Conclusion In the United States, certain worker benefits are guaranteed by the government. Others are provided on the open market. In either case, access to such programs is wide ranging. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence Please see the sections of the applicable indicators for mechanisms and supporting evidence related to compliance. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	The requirements in the SBP standards are applicable at a range of scales. For some indicators, compliance does not occur at the level of the worker, but rather in the administration of the organization. Examples of this would be 2.2.1 and 3.2.2. On the other hand, compliance for many indicators comes down to each individual worker on the ground doing their part. In these cases,

	training of those workers is critical to ensure feedstock sourcing does not violate SBP standards. Regulations & Enforcement Indicators for which employees would need to be trained in order to know how to comply with SBP include: 1.1.1, 1.1.2, 1.1.4, 2.1.3, 2.2.3, 2.2.4, 2.2.5, 2.2.6, 2.2.7, 2.2.8, 4.1.4, 4.1.9, 4.1.10, 4.2.7. Each of these indicators are backed by laws and regulations which would inherently involve some level of employee training. Not all of these laws explicitly require formalized training, but for those that do not, employees would learn the pertinent information as a matter of course in their work. For specifics, see the sections on those indicators. In the supply base, specified risk has been identified, meaning that the SBP standard is stricter than the legal standard. In these instances, training up to the SBP standard level may not occur, as there is not a legal incentive for it. Conclusion Not all requirements in the SBP standards require employee training to ensure compliance. For those that do, feedstock suppliers are incentivized by law to conduct such training. However, if the SBP standard is stricter than the legal standard such that specified risk is present, training may not occur. Specified risk has been assigned relating to all other indicators in the PNW assessment where Specified risk was identified.
Risk Rating	Specified Risk

United States Pacific Northwest	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Mechanisms & Supporting Evidence Grievances that are covered under legislation can be reported to the appropriate agency, whether that is the Wage and Hour division of the Department of Labor (DOL), the Occupational Health and Safety Administration (OSHA), or a state department of labor. In addition, litigation to resolve grievances related to employment discrimination are active in the United States, as the US Equal Employment Opportunity Commission (EEOC) is legally mandated to investigate charges of discrimination filed against any company with 15 or more employees. In 2020 alone, the EEOC resolved 70,804 charges of employment discrimination, awarding victims a collective \$439.2 million. Finally, it is common for larger companies to have human resource departments. Among other responsibilities, human resource departments develop policies for managing employee relations and dispute resolution. https://www.indeed.com/hire/c/info/grievance-definition https://www.usa.gov/workplace-laws https://americansforfairtreatment.org/2022/09/09/the-union-

	grievanceprocess-clearing-up-common-misconceptions/ https://www.dol.gov/agencies/whd/contact/complaints https://www.osha.gov/workers/file-complaint https://www.justia.com/employment/employment-discrimination/eeoc/ https://www.eeoc.gov/newsroom/eeoc-releases-fiscal-year-2020enforcement-and-litigation-data https://www.coursera.org/articles/what-is-hr For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context Workplace grievances are real or perceived problems experienced by employees. Employers are responsible for promoting a safe workplace environment and dealing with employee complaints and grievances. Regulations & Enforcement While there is no legislation in the US that pertains to employee grievances broadly, there are a variety of federal laws which cover specific types of grievances. These include (but are not limited to) the Age Discrimination in Employment Act, the Americans with Disabilities Act, the Equal Pay Act, Title VII of the Civil Rights Act, the Family and Medical Leave Act, the Fair Labor Standards Act, and the Occupational Health and Safety Act. When employers violate these acts, legal recourse is typically available. If an employee is a member of a collective bargaining agreement, they may also have legal recourse against violations of the agreement terms, even if the violation isn't covered under any other law. In addition to federal laws, all states in the supply base have their own departments of labor which may protect other types of grievances. Conclusion The United States has a variety of policies which provide legal routes to resolve employee grievances and disputes. For grievances not covered under these laws, additional pathways exist in the form of collective bargaining agreements and human resource departments. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States
Pacific Northwest

Indicator

4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	Mechanisms & Supporting Evidence OSHA works to increase workplace health and safety via its training institute. The institute provides a range of courses and programs to educate employers and employees on how to identify and prevent workplace hazards, as well as comply with OSHA regulations. OSHA also performs workplace inspections, with over 24,000 inspections carried out in 2021. Employees can file complaints to OSHA in person, by mail, or on the OSHA website. OSHA violations can lead to serious consequences for employers, including fines, penalties, and even criminal charges in severe cases. Logging is considered one of the most hazardous jobs in the United States due to the high risk of injury and fatalities; the non-fatal injury rate for workers in the logging industry is 2,449 injuries per 100,000 workers, with 135.9 fatal injuries per 100,000 workers. Despite the inherent dangers of logging, mechanization has greatly increased the safety of the industry. For cost effectiveness reasons, feedstock harvesting can be expected to mostly consist of mechanized operations, which will reduce the number of workers exposed to hazards such as falling trees, rolling logs, and other types of accidents. In addition to mechanization, logging companies have implemented safety protocols and training programs to ensure that workers are properly trained to operate equipment and identify and mitigate potential hazards. https://www.ilo.org/global/standards/subjects-covered-by-international-labourstandards/occupational-safety-and-health/lang--en/index.htm https://www.osha.gov/aboutosha https://www.osha.gov/faq https://www.osha.gov/stateplans https://www.osha.gov/otiec/ https://www.osha.gov/enforcement/2021-enforcement-summary https://www.osha.gov/workers/file-complaint https://www.legalscoops.com/logging-continues-to-be-most-dangerous-job-in-america https://lni.wa.gov/safety-health/safety-research/files/2019/75_36_2019_bonauto_loggingindustryclaimrates.pdf https://wood-energy.extension.org/conventional-biomass-harvestingsystems/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	The International Labour Organization (ILO) Constitution sets forth the principle that workers must be protected from sickness, disease and injury arising from their employment. Nearly half of all ILO instruments deal with occupational health and safety in some form.

	Regulations & Enforcement With the Occupational Safety and Health Act of 1970, Congress created the Occupational Safety and Health Administration (OSHA) under the US Department of Labor to ensure safe and healthful working conditions for workers by setting and enforcing standards and by providing training, outreach, education and assistance. OSHA has policies which pertain to a wide variety of workplace hazards, including (but not limited to) hazardous chemicals, indoor air quality, injuries, personal protective equipment, and temperature extremes. In addition to the general protections and policies of OSHA, states can voluntarily create a workplace safety and health program to be approved and monitored by OSHA. California, Oregon, Washington, and Wyoming have each created a state plan. Moreover, all states in the supply base except Wyoming have their own separate organizations that participate in monitoring workplace safety compliance. Conclusion The Occupational Health and Safety Administration collaborates with private and state entities to promote and enforce safe workplace procedures. While logging is a dangerous profession, technological advancements are making it safer, particularly for the harvest of low-grade material such as feedstock. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Mechanisms & Supporting Evidence On federal land, timber trespass is approached seriously. For example, during active timber sales, the Forest Service implements timber theft prevention plans that involve the use of specialized tracer paint. The Forest Service has also developed software for determining the value of stolen trees. Nevertheless, little public data exists on the frequency of timber trespass on federal lands. The same is true of private lands. Anecdotal news stories regarding timber theft, when they occur, tend to consist of a small quantity of valuable trees being covertly harvested. Since pulpwood purchased by Drax is of low value compared to timber for lumber, veneer, or other products, and very large-scale illegal operations would need to occur for such an enterprise to be profitable, it is unlikely the material purchased by Drax would come from timber trespass. No evidence exists of such large-scale criminal enterprises in the United States. Finally, The International Property Rights Index ranks the United States as

	having very strong property rights laws, assigning a ranking of 13 out of 129 countries. This index examines the robust relationship between property rights and other economic and social indicators of well-being including – gender equality, illicit trade, innovation, competition, research and development, human development, fighting corruption, and measures of internet connectedness. https://crsreports.congress.gov/product/pdf/RL/RL33932/8 https://impact.economist.com/sustainability/project/foodsecurityindex/reports/Economist_Impact_GFSI_2022_Global_Report_Sep_2022.pdf https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=3346.&lawCode=CIV https://www.idl.idaho.gov/wp-content/uploads/sites/2/2020/06/timbertrespass-1.pdf https://leg.mt.gov/bills/mca/title_0700/chapter_0160/part_0010/section_0070/0700-0160-0010-0070.html https://oregon.public.law/statutes/ors_105.810 https://app.leg.wa.gov/rcw/default.aspx?cite=64.12.030 https://wyoleg.gov/InterimCommittee/2019/01-201906031301LSOTopicSummaryTrespass.pdf https://www.bidnet.com/bneattachments?/518697644.pdf https://www.fs.usda.gov/forestmanagement/products/measurement/tools/timbertheft/index.php https://www.internationalpropertyrightsindex.org/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	According to the Congressional Research Service, two negative social and community impacts commonly occur from logging activities worldwide. The first is the loss of subsistence forest resources for local communities; for example, if a community depends on the forest for food, the loss or degradation of that forest can leave the people without a critical resource. The second relates directly to illegal logging: if timber and other forest products are harvested illegally, the legal prices of those commodities become depressed by black-market competition. Worldwide, timber prices are depressed by an estimated 7-16% annually due to illegal log sales. This can have deleterious effects on forest products economies. Regulations & Enforcement Subsistence directly from forests is very uncommon in the United States, and the country's food security is extremely high, with a ranking of 13th out of 113 counties in the global food security index. Moreover, if a community were to be living off forests they owned, their timber would be protected from illegal harvest by timber trespass laws. These timber trespass laws also address the second concern, as they prevent the emergence of black-market timber which could negatively impact the forest products economy. All states in the supply base have laws relating

	to timber trespass: • California: Civil Code Section 3346 • Idaho: Section 6-202 • Montana: Code 70-16-107 • Oregon: ORS 105.810 • Washington: RCW 64.12.030 • Wyoming: WS 11-34-130 applies to state-owned land and does not protect timber on private lands. General laws relating to theft of property can be found in WY 6-3-402. With the exception of Wyoming, all of these codes are enforced by civil lawsuits filed by the victim for the value of the trees removed. In Wyoming, code violations are addressed via fines and/or imprisonment. Conclusion Negative community impacts from logging activities generally relate to the practice of illegal logging. A variety of laws exist in the supply base to prevent illegal logging, and evidence suggests that these laws are effective. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NF-FOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Mechanisms & Supporting Evidence Forest products are a significant contributor to the economies of several states within the supply base. Wood energy markets can be a large boon to forest economies, and are promoted the state and federal level. For example, the US Forest Service Wood Innovation Grant program has a specific categorical carveout for “Renewable Wood Energy.”. Nationwide, the introduction of new wood markets of all types is seen as an economic benefit; numerous state grant programs exist to push this goal both inside and outside the supply base. Forest products contribute to the economy for all states in the supply base but are most impactful in Oregon and Washington. In Oregon, 3% of all employees in the state work in forest products. Meanwhile, in Washington, 5% of state GDP comes from the forest products industry. https://ilostat.ilo.org/forest-sector-employs-33-million-around-the-worldaccording-to-new-global-estimates/ https://www.bls.gov/ooh/farming-fishing-and-forestry/logging-workers.htm https://forisk.com/blog/2023/04/20/logging-capacity-and-the-

	lonesomeloggers/ https://www.themountaineer.com/news/canton-mill-closure-spells-trouble-forforestry-industry/article_c44e91d8-d7d9-11ed-8b324bf77371610a.html https://www.fs.usda.gov/inside-fs/delivering-mission/sustain/wood-energyprojects-sustain-forests-communities-and https://www.fs.usda.gov/science-technology/energy-forest-products/woodinnovation https://www.fire.ca.gov/what-we-do/natural-resourcemanagement/environmental-protection-program/wood-products-andbioenergy https://northernforest.org/future-forest-economy-initiative/ https://oregonforestfacts.org/#employment http://choosewashingtonstate.com/why-washington/our-key-sectors/forestproducts/ For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	According to the International Labour Organization, the forest sector employees 33 million workers worldwide. Introducing a new market for woody materials has the potential to increase employment and economic activity in the area from which that market sources. In the US specifically, logging employs around 48,500 workers, and this number is expected to decline in the coming decade. In addition, 43,000-owner operators run logging businesses in the US. Low grade wood markets are very important to US forest economies, and the loss of these markets can have devastating impacts on their surrounding forest workforces. Regulations & Enforcement No regulations pertaining to this indicator are present in the supply base. Conclusion New markets for forest products can contribute positively to local economies in the supply base, both via employment and increases in GDP. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	Mechanisms & Supporting Evidence

Federal and state law pertaining to BMPs are enforced by agencies including the US Environmental Protection Agency, US Army Corps of Engineers, and state forestry agencies. Failure to comply with state and federal law can result in litigation and penalties. Actions on federal land are also subject to review under NEPA. NEPA is enforced via litigation from environmental non-profits, with an average of 129 NEPA lawsuits filed annually. The median Environmental Impact Statement produced by these land managing agencies under NEPA guidelines takes 3-4 years to complete, indicating a rigorous investigative process.

The California, Oregon, and Washington forest practice acts require the creation of harvest plans which incorporate BMPs for all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. Idaho and Montana do not require the creation of harvest plans but do conduct field audits on operations. Violations of state BMPs carry harsh penalties in Idaho, while compliance is voluntary in Montana. Regardless, recent audits in both found compliance exceeding 98%. In Wyoming, use of BMPs on state lands is required, with audits showing BMPs successfully mitigated impacts to water quality. Use of BMPs on Wyoming private lands is voluntary, and limited data exists on levels of compliance.

The EPA publishes data annually on the quality of drinking water in the United States. Since 1999, over 90% of community water systems in the United States have passed EPA health standards each year. This suggests that existing legislation has been effective at protecting clean drinking water from contamination by industrial, forestland, and other activities.

https://impact.economist.com/sustainability/project/food-securityindex/reports/Economist_Impact_GFSI_2022_Global_Report_Sep_2022.pdf

<https://www.unwater.org/water-facts/human-rights-water-and-sanitation>

<https://www.sciencedirect.com/science/article/pii/S0378112722003917>

<https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/>

<https://www.idl.idaho.gov/about-forestry/forest-practices-act/>

<https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices>

<https://www.oregon.gov/odf/Pages/lawsrules.aspx>

<https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09>

<https://wsfd.wyo.gov/forest-management/bmp-s>

<https://academic.oup.com/jof/article/118/4/403/5825558>

<https://dnrc.mt.gov/Forestry/Forest-Management/best-managementpractices>

<https://idahoforests.wpenginepowered.com/wp-content/uploads/2019-ForestPractices-Year-End-Report.pdf>

<https://drive.google.com/file/d/14gKwFYAW9EM5cl5ASDGtjb5oazwpnLFt/view?usp=sharing>

<https://cfpub.epa.gov/roe/indicator.cfm?i=45>

For an assessment of Federal Lands, See Interim US National Forest RRA

	https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	In the United States, the vast majority of the food supply is agricultural. Subsistence directly from forests is very uncommon in the United States, and the country's food security is extremely high, with a ranking of 13th out of 113 counties in the global food security index. Therefore, we will focus on maintaining or enhancing the water supply for the purposes of this indicator. The United Nations views access to clean drinking water as a basic human right. Feedstock harvesting should not be permitted to infringe on this right by introducing contaminants to drinking water. Regulations & Enforcement The effects of forest management activities on water sources can be mitigated via adherence to Best Management Practices (BMPs). There are both federal and state level regulations related to BMPs for forest management in the United States. Federal laws affecting forest management include but are not limited to the National Environmental Policy Act of 1969, the Clean Air Act of 1970, the Clean Water Act of 1972, the Endangered Species Act of 1973, the National Forest Management Act of 1976, the Forest Land Policy and Management Act of 1976, the Federal Insecticide, Fungicide, and Rodenticide Act of 1948, amended in 1996. In addition, federal land management agencies develop area specific management plans including the 1994 Northwest Forest Plan, and management plans for individual National Forest or Bureau of Land Management units. State laws in the supply base include: • California: California Forest Practice Act • Idaho: Idaho Forest Practices Act • Montana: Montana Forestry Best Management Practices Notification Law • Oregon: Oregon Forest Practices Act • Washington: Washington Forest Practices Act Wyoming does not have a forest practices act, but does publish BMPs for forestland operations. Conclusion Federal and state governments in the United States have implemented multiple pieces of legislation to protect drinking water and mitigate the impacts of forest management activities on waterways. Data collected by the US Environmental Protection Agency indicates these measures have been effective. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
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.
Supply Base Verifiers	If members of a tribe believe their reserved rights are not being respected, they can sue the offending party in federal court. Many court cases have reaffirmed and strengthened treaty rights; for example, in <i>Worcester v. Georgia</i> (1832), the Cherokee Nation challenged the state of Georgia's attempts to impose its laws on Cherokee lands. The Supreme Court ruled that the Cherokee Nation was a sovereign entity with the right to self governance, and that Georgia had no authority to regulate the Cherokee lands. Another example is <i>United States v. Washington</i> (1974): this case involved the interpretation of a treaty between the United States and several Pacific Northwest tribes that guaranteed the tribes' right to fish in their traditional waters. The state of Washington had attempted to regulate the tribes' fishing activities, but the Supreme Court ruled that the treaty rights took precedence over state law. The decision affirmed the principle that tribal treaty rights are a form of federal law that can preempt state laws, and that the government has a trust responsibility to protect and enforce these rights. https://social.desa.un.org/sites/default/files/migrated/19/2018/11/UNDRIP_E_web.pdf https://law.jrank.org/pages/8748/Native-American-Rights-Reserved-RightsDoctrine.html https://www.justia.com/native-american-law/hunting-and-fishing-rights-ofnative-americans https://www.americanindianmagazine.org/story/nation-nation-treatiesbetween-united-states-and-american-indian-nations https://www.ncai.org/tribalnations/introduction/Tribal_Nations_and_the_United_States_An_Introduction-web-.pdf https://usafacts.org/articles/how-native-american-tribes-and-the-usgovernment-relate-to-each-other/ https://www.acf.hhs.gov/ana/fact-sheet/american-indians-and-alaska-nativesfederal-recognition https://www.britannica.com/topic/Worcester-v-Georgia https://www.historylink.org/File/21084 For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context The UN Declaration on the Rights of Indigenous Peoples recognizes the urgent need to respect and promote the rights of indigenous peoples to their lands, territories and resources. Feedstock sourcing should not contribute to

	historic infringements on these rights. Regulations & Enforcement Rights of federally recognized tribes in the United States are governed by 'reserved rights doctrine,' which states that any rights not specifically relinquished in a historic tribal treaty are reserved for the tribe. That is, if 1) the tribe had rights to hunt, graze, harvest firewood, fish, etc. on a given territory, and 2) there is no historic document in which that right was waived by the tribe, then that right still exists and will be protected by the American legal system. This will be true even if land on which the tribe has reserved rights is sold into private ownership. A total of 368 treaties dating all the way back to 1777 exist between the federal government and recognized tribes. In addition to the reserved rights doctrine, pursuant to Executive Order 13175 of November 6, 2000, all executive departments and agencies are required to regularly consult with federally recognized tribes on policies which may have tribal impacts. State agencies also engage in government to government relations with tribes. There are currently 574 federally recognized tribes. Not all tribes are federally recognized, but those which are unrecognized are able to apply for recognition status via administrative procedures under 25 CFR Part 83. Until they are recognized, these tribes are not governed under reserved rights doctrine. Conclusion The treaty system and reserved right doctrine serve to uphold the rights of indigenous peoples in the supply base. They are backed by a century-and-a-half of jurisprudence. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	Mechanisms & Supporting Evidence The National Congress of American Indians keeps an active ledger of court cases involving federally recognized tribes. Plaintiffs and Defendants have included federal and state governments, non-profit organizations, corporations, and non-tribal individuals. The most recent lawsuits occurred in 2020, though on any given year there may be a dozen such suits. Outcomes of these suits have included alteration to

	law, implementation of environmental mitigation measures, and financial compensation. https://social.desa.un.org/sites/default/files/migrated/19/2018/11/UNDRIP_E_web.pdf https://law.jrank.org/pages/8748/Native-American-Rights-Reserved-RightsDoctrine.html https://www.bonalaw.com/insights/legal-resources/tribal-sovereign-immunity-a-defense-available-to-individuals https://ncai.org/resources/legal-filings https://www.britannica.com/topic/Worcester-v-Georgia https://www.seattletimes.com/seattle-news/environment/tied-u-s-supremecourt-decision-means-washington-must-remove-barriers-to-salmon-migration/ https://www.npr.org/templates/story/story.php?storyId=121216558 For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Context The UN Declaration on the Rights of Indigenous Peoples recognizes the urgent need to respect and promote the rights of indigenous peoples to their lands, territories and resources. If indigenous peoples feel that feedstock sourcing has infringed on their traditional use rights, mechanisms should be in place to resolve and prevent further disputes. Regulations & Enforcement Rights of federally recognized tribes in the United States are governed by 'reserved rights doctrine,' which states that any rights not specifically relinquished in a historic tribal treaty are reserved for the tribe. That is, if 1) the tribe had rights to hunt, graze, harvest firewood, fish, etc. on a given territory, and 2) there is no historic document in which that right was waived by the tribe, then that right still exists and will be protected by the American legal system. If members of a tribe believe their reserved rights are not being respected, they can resolve this dispute by filing a lawsuit in federal court. Tribes themselves can also be sued by non-tribal entities, though they have 'sovereign immunity,' which allows them to dismiss any lawsuit against themselves unless the suit is explicitly authorized by Congress. Conclusion The United States has a long history of resolving tribal resource right disputes via the federal court system. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States	Indicator
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Pacific Northwest	
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.
Supply Base Verifiers	Mechanisms & Supporting Evidence The National Congress of American Indians keeps an active ledger of court cases involving federally recognized tribes. Plaintiffs and Defendants have included federal and state governments, non-profit organizations, corporations, and non-tribal individuals. The most recent lawsuits occurred in 2020, though on any given year there may be a dozen such suits. https://social.desa.un.org/sites/default/files/migrated/19/2018/11/UNDRIP_E_web.pdf https://law.jrank.org/pages/8748/Native-American-Rights-Reserved-RightsDoctrine.html https://www.britannica.com/topic/Worcester-v-Georgia https://www.seattletimes.com/seattle-news/environment/tied-u-s-supremecourt-decision-means-washington-must-remove-barriers-to-salmon-migration/ https://www.npr.org/templates/story/story.php?storyId=121216558 https://ncai.org/resources/legal-filings For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	The UN Declaration on the Rights of Indigenous Peoples recognizes the urgent need to respect and promote the rights of indigenous peoples to their lands, territories and resources. If feedstock sourcing has infringed on the traditional use rights of indigenous peoples, a mechanism should be in place to compensate them fairly for the infraction. Regulations & Enforcement Rights of federally recognized tribes in the United States are governed by 'reserved rights doctrine,' which states that any rights not specifically relinquished in a historic tribal treaty are reserved for the tribe. That is, if 1) the tribe had rights to hunt, graze, harvest firewood, fish, etc. on a given territory, and 2) there is no historic document in which that right was waived by the tribe, then that right still exists and will be protected by the American legal system. If members of a tribe believe their reserved rights are not being respected, they can resolve this dispute by filing a lawsuit in federal court. If the court finds in favor of the tribe, a variety of different compensatory measures may be implemented, depending on the desires of the tribe and the circumstances of the suit. Examples of historical compensatory measures these suits have included alteration to law, implementation of environmental mitigation measures, and financial payments.

	Conclusion The United States has a long history of resolving tribal resource right disputes via the federal court system. Low risk is assigned on all land types in the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RR-USA-NFFOR_v1.0-RR-for-US-National-FOR_Interim.pdf
Risk Rating	Low Risk

United States Pacific Northwest	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Mechanisms & Supporting Evidence According to the 2021 Preserve America Report, the US Forest Service has implemented a number of improvements to its heritage protection program in recent years. In addition to continued collaboration with tribal authorities to identify, protect, and study cultural heritage sites, modern tools have recently been implemented to locate new sites. These include the use of LIDAR and Ground-Penetrating Radar. The California, Oregon, and Washington forest practice acts require the creation of harvest plans that identify and outline protection measures for historic sites during all state and private timberland operations. Harvest plans and associated operations are reviewed by state agencies, both in the office and in the field. If a site on private land is registered with a SHPO, this does not confer legal protections onto it. Landowners who voluntarily register a site would be unlikely to damage it during timber operations. However, if their land is sold to a different owner who does not wish to protect the site, the site could be damaged. https://www.fs.usda.gov/managing-land/heritage https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.fs.usda.gov%2Fim%2Fdirectives%2Fsm%2F2300%2F2360_clear.doc&wdOrigin=BROWSELINK https://bof.fire.ca.gov/regulations/bills-statutes-rules-and-annual-californiaforest-practice-rules/ https://www.oregon.gov/odf/Pages/lawsrules.aspx https://apps.leg.wa.gov/RCW/default.aspx?cite=76.09 https://history.idaho.gov/shpo/ https://mhs.mt.gov/Shpo/index4 https://wyoshpo.wyo.gov/ https://www.nps.gov/subjects/taxincentives/index.htm https://wyospcr.wyo.gov/ https://www.saa.org/about-archaeology/archaeology-law-ethics https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/PreserveAm

	ericaReport-web.pdf For an assessment of Federal Lands, See Interim US National Forest RRA https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRR-US-NFFOR_v1.0-RRR-for-US-National-FOR_Interim.pdf
Risk Rating justification	Historic sites that can be found in the forests of the United States include ancient villages, rock art, travel routes and markers, military forts, and abandoned mines and mills. It is important that these sites are preserved and unaffected by feedstock harvesting to the greatest extent possible. Regulations & Enforcement According to section 2360 of the US Forest Service Manual, the following laws pertain the protection of cultural heritage sites on public lands: the Organic Act of 1897, the Antiquities Act of 1906, the Historic Sites Act of 1935, the Natural Historic Preservation Act of 1966, the National Environmental Policy Act of 1969, The Archeological and Historic Preservation Act of 1974, the Federal Land Policy and Management Act of 1976, the Archaeological Resources Protection Act of 1979, The Native American Graves Protection and Repatriation Act of 1990, and the Federal Lands Recreation Enhancement Act of 2004. Collectively, these acts require that all activities on federal lands undertake the necessary steps to preserve and protect cultural resources. State laws also exist to protect cultural resources on private and state lands during forestry operations, including the California Forest Practice Act, the Oregon Forest Practices Act, and the Washington Forest Practices Act. In Idaho, Montana, and Wyoming, state historic preservation offices (SHPOs) help educate and encourage private landowners to preserve the cultural resources on their properties. Tax incentives are sometimes available to landowners who rehabilitate these sites. If a cultural or historic site on private or state land is not listed with the state SHPO, it would not be considered “registered” per the requirements of this indicator. Given that SHPOs are administered by state governments, they are most likely to be successful in protecting heritage sites on state-owned lands versus privately owned lands. This is especially true in Wyoming, which has a separate department dedicated to preserving cultural resources on state lands. Privately owned lands pose a greater challenge; ultimately, cultural resources in these three states are considered the property of the landowner, and no laws exist which explicitly require their preservation. The exception to this is human remains and burial sites, which are protected under federal law on both private and public lands. Conclusion The federal government has a long history of passing laws to protect and preserve historic sites on its own lands. Some states in the supply base have extended these protections to private lands, but others have not. Specified risk is assigned pertaining to the potential disturbance or destruction of designated cultural heritage sites on private lands in Idaho, Montana, or Wyoming. Low risk assigned to the rest of the supply base. For an assessment of Federal Lands, See Interim US National Forest RRA

	https://sbp-cert.org/wp-content/uploads/2025/03/SBP-RRA-US-NFFOR_v1.0-RRA-for-US-National-FOR_Interim.pdf
Risk Rating	Specified Risk

Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

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

Prior to receiving fiber from a Residual Fiber (processing residues & tertiary feedstock) source, the Fiber Team will submit an approval request to the Sustainability Team via MS Forms. Included in the approval request will be a “Residual Fiber Questionnaire” that the Sustainability Team will use to collect information from the supplier, including but not limited to:

- i. Name and address of the supplier
- ii. Type of Supplier (e.g. purchaser, saw/pulp mill, broker/trader, remanufacturer)
- iii. Categories of feedstock to be supplied (including relevant SBP product groups)
- iv. Level of control required for the supplier to assure correct fiber is being sent to the BP
- v. Self-declaration that the feedstock qualifies as processing residue or waste according to the EU RED

b) The BP will monitor the compliance of its suppliers with SBP definitions and purchase specifications by using the answers provided in the Residual Fiber Questionnaire & corroborate the submissions in the Supplier Audit process. Suppliers that are found to have non-conformities with the verification process or have been found to be misleading the BP in the questionnaire, the Procurement Policy Mitigation Measure will be implemented as follows:

Mitigation Measure: Procurement Policy

Any feedstock from a supplier who either does not provide enough information or is found to have purposefully mislead the BP in questionnaires will be considered SBP controlled feedstock until the proper information can be collected. SBP Compliant or SBP Controlled determinations are made monthly therefore either status will apply for a minimum of one month or until the required information is collected. In cases where information cannot be obtained, or the supplier has demonstrated multiple nonconformities that are unreasonable the BP will:

- Determine the root cause of the supplier's unwillingness to cooperate
- Determine if there is a way to obtain information that protects the suppliers' sensitivities but still achieves the BP's information requirements
- If the supplier and the BP cannot come to a mutual agreement on required information the BP may:
 - o Determine the feedstock is non-eligible input for SBP products
 - o Withhold the supplier's deliveries to the BP's facilities
 - o Non-renewal of purchase agreements upon expiry
 - o Termination of the purchase agreement
 - o Removal from consideration on future purchases

The information provided by the secondary suppliers are reviewed annually and verified by third party auditors to ensure they are complete and correct. The annual information collection and verification exercise reviews the mitigations effectiveness. Any deficiencies are uncovered, and new methodologies are developed to close any uncovered gaps.

Feedstock inspection and classification upon receipt

All loads of fiber received by the BP are tracked within the company's LIMS tracking system. For a delivery to be entered into the LIMS system & accepted by the BP, the contract for fiber purchased needs to be agreed upon and set up.

Upon receipt of fiber deliveries to the BP, the supplier will be accompanied by documentation relating to the fiber that they are delivering. This fiber is visually inspected upon receipt for accuracy with the accompanied delivery documentation with a sample of loads from each supplier being selected for sample testing of the product. The supplier delivering fiber to the BP's site will be in communication with representatives of the plant to ensure

products are sorted accordingly in the fiber yard.

Once a supplier is approved for delivery to the BP through the Residual Fiber Questionnaire process, the Sustainability Team will classify which SBP feedstock category the fiber will belong to. All Residual Fiber suppliers to the BP will be included in the sample for the Supplier Audit process to ensure that EU RED compliance is ensured.

Supplier audit for processing residues and post-consumer feedstock

The BP will annually review the list of Residual Fiber suppliers to each site included in its SBP Certification Program & a sample of these suppliers will be selected for the Supplier Audit process. The annual audit will entail the following:

- A review of the answers provided in Residual Fiber Questionnaire that was supplied to the BP by the supplier, with the supplier
- A review of the Supplier Mapping Package provided (if applicable)
- An onsite visit of the supplier's facility by the Sustainability Team, which will consist of the following verification:
 - o Raw material procured by the supplier
 - o Preparation of feedstock for the BP from the supplier (confirmation that fiber is a processing waste or postconsumer feedstock)
 - o How fiber is loaded for transport to the BP

To select the sample of supplier sites to be visited the BP will consider the following classifications:

- Suppliers that are under common ownership & supply the same SBP feedstock category will be considered as one for the audit selection
 - o In this scenario, the BP will target an audit of different sites under the classification in subsequent audit periods
- Suppliers that are under different ownership, but are managed under the same certification certificate scope & supply the same SBP feedstock category will be considered as one for the audit selection
 - o In this scenario, the BP will target an audit of different sites under the classification in subsequent audit periods
- For each SBP Certificate held by the BP, the sample will be calculated as the following:

Audit Sample Size = $\sqrt{(x) \cdot 0.8}$

Where X is equal to the number of suppliers classified with the above considerations.

The BP will maintain documentation in the form of pictures, spatial location, & an internal assessment form for each supplier audit. This documentation will be made available to auditors during the external audit. If any nonconformities with the procedure are found through the Supplier Audit process, they will be subjected to the Procurement Policy mitigation measure as described above.

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).