Compliance with the SBP Framework: Public Summary Report

SCS Global Services
Evaluation of Groupe Lebel, Inc.

Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org

Completed in accordance with the CB Public Summary Report Template Version 2.0

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

Document history

Version 2.0	**Published 10 August 2023**

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1 Overview

Certification Body (CB) Name:	SCS Global Services
Primary CB contact for SBP:	Maggie Schwartz
Primary CB contact email:	mschwartz@scsglobalservices.com
Audit team leader:	Hervé Bescond
Audit team members:	ERROR: Works only for SBR or PSR form. Please alter the function by adding more tables, or by dynamic sql
Name of the Company:	Groupe Lebel, Inc.
Company legal address:	54 rue Amyot, G5R 3E9 Rivière-du-Loup, Canada
Company contact for SBP:	Pierre-Olivier Morency
Company contact email:	pierre-olivier.morency@groupelebel.com
Company website:	
Date of installation:	
SBP Certificate Code:	SBP-04-73
Date of certificate issue:	15 Jul 2022
Date of certificate expiry:	14 Jul 2027
Audit closing meeting date:	03 Jun 2026
Audit cycle:	Fourth Surveillance Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Kresimir Colic
Date of decision:	11 Sep 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 9039	NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
Requirement:	4.1.5 A complete DTS Transaction consists of the following data items – Transaction Date – Transaction Reference – One or more PB ID – One or more mass (of certified Biomass from the referenced PB ID) – One or more Product Type – One or more SBP Claim – Originating Legal Owner (supplier) – Receiving Legal Owner (customer) – Transaction documents (if applicable) N/A N/A N/A
Description of Non-conformance and Related Evidence:	
The wrong Production Batch ID has been used for one transaction recorded in the DTS	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

2.3 Closed non-conformities

NC number 9038 copied from 5879	NC Grading: Minor
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	5.3.4 The Organisation shall determine SBVs to evaluate whether operators within the Supply Base are implementing best practices that demonstrably meet the Indicators of SBP Standard 1. N/A N/A
Description of Non-conformance and Related Evidence:	
The CH has not implemented his supplier verification program for forest feedstock	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	The audit program has been reviwed and implemented. Audits of operators have been made since the previous surveillance audit.
Findings for Evaluation of Evidence:	The audit program has been implemented in conformance with the requirements of the standard.
NC Status:	Closed

2.4 Actions taken by Organisation Prior to Report Finalisation

N/A

2.5 Notes for the next Audit

N/A

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	
Approved Standards	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 EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Product Group IDs	☒ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☒ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	Yes
Includes RED II Scheme	Yes
Includes RED II Supply Base Evaluation (SBE)	Yes
Products	WB 1.1 Wood pellets
Feedstock origin (countries):	Canada, United States
SBP-endorsed Regional Risk Assessments used: **Public link:** **https://sbp-cert.org/documents/standards-documents/risk-assessments/**	SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec 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-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	No
Changes in the scope	N/A

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

Groupe Lebel Inc is a pellet producer located in Cacouna, Quebec. The pellet will be produce from secondary and tertiary feedstock wich will be supplied from Groupe Lebel sisters companies. The pellets will be shipped from the Port of Cacouna to the customer.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Ferme Chouinard	Notre Dame du Nord	Verification of BMP's implementation	☒
Les Arbres de l'Est	Notre Dame du Nord	Verification of BMP's implementation	☒

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

4 Specific objective of the audit

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented over scope of certification.

The following Critical Control Points (CCPs) were identified and evaluated (edit list as appropriate and describe how the organization controls each point and how it was evaluated). Note that you may identify other CCPs for a particular client which you should also describe in the report:

CCP	Description, including how evaluated by SCS
Processes for procurement and processing, transport and storage	Secondary and tertiary feedstock: contracts and supplier declarations for sawdust, shaving, offcuts, and other mill residues are used to secure ownership transfer and ensure compliance to SBP requirements. Trip tickets with unique identifiers are used during transport from the supplier to the pellet mill. Upon delivery to the pellet mill, a scale ticket is issued, and material is dropped off in designated sorting areas. This critical control point has been evaluated via document review of SBE, related procedures, interviews with procurement staff and suppliers. Storage: When material is pulled for production, it is weighed to track how much is used for production and how much remains in stock.
Volume accounting method	Material is measured in bone-dry metric tonnes. When it is pulled for production, it is weighed.
Documentation of transactions	Load summaries, trip tickets (BOLs), scale tickets, invoices, and DTS reports
Energy data collection and reporting	Feedstock transport, production, delivery to port, and, where applicable, loading onto buyer's vessel.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Hervé Bescond	16.0
2. On-site (excl. travel time)	Hervé Bescond	8.0
3. Report writing	Hervé Bescond	10.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Hervé Bescond	Lead auditor	Lead SBP, PEFC CoC, SFI Coc, SFI FM , FSC CoC, FSC FM and ISO 14001 auditor

5.3 Description of evaluation activities

Site Name or Location: 313, Boul. Industriel, Cacouna (Québec) G0L 1G0

Date and Time of Audit: May 27-June 1, 2026- Remote

Audit Activity	Items to Review / Actions	Approx. Start Time
Secondary Supplier Audits	Interviews with suppliers	

Site Name or Location: 313, Boul. Industriel, Cacouna (Québec) G0L 1G0

Date and Time of Audit: May 27-June 1, 2026- Remote

Audit Activity	Items to Review / Actions	Approx. Start Time
Review of CoC/SBP procedures, products and material accounting	Written procedures, work instructions, feedstock description (see ID 5B section 4), product group list, accounting system (transfer, percentage or credit; physical separation, percentage method)	8:30 AM
Review of material balances and records	Auditor-selected sample of the following: material tracking system, summary of purchases and sales, invoices, shipping documents,	11:30 AM

	training records, outsourcing agreements, other applicable SBP/CoC systems, procedures and records	
Verification of calculations	Auditor-selected sample and verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable	1:30 PM
SBP ST 5, ID5A, ID5B, & ID5C	Review of GHG data collection	2:30 PM

Site Name or Location:	313, Boul. Industriel, Cacouna (Québec) G0L 1G0	
Date and Time of Audit:	June 3, 2026	
Audit Activity	**Items to Review / Actions**	**Approx. Start Time**
Opening meeting	Introductions, auditor review of audit scope, audit plan and intro/update to SBP, FSC, and SCS standards and protocols, client description of organization	8:30 AM
Review of material balances and records	Auditor-selected of the following: material tracking system, summary of purchases and sales, invoices, shipping documents, training records, outsourcing agreements, other applicable SBP/CoC systems, procedures and records, tracebacks from certified outputs to eligible inputs	
Verification of calculations	Auditor-selected sample and verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable	
SBP ST 5, ID5A, ID5B, & ID5C	Review of GHG data collection	
Evaluation of trademarks	Review of auditor-selected sample of SBP/FSC/PEFC and/or SCS on-product and/or promotional trademark uses; review of any on-site trademark uses such as banners, posters, entryway signs	
Walkthrough of facility	Review of physical inputs and outputs, material receipt, processing, storage, credit account (if applicable), sale, and overall control	
Staff interviews	Interviews with appropriate number and diversity of staff to assess knowledge of CoC procedures related to their position	
Field Visit	Field Visit	12:30 PM-4:30 PM
Closing meeting preparation	Auditor takes time to consolidate notes and review audit findings for presentation at closing meeting	4:30 PM
Closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps	5:00 PM

5.4 List of forest management units and feedstock suppliers visited

☐ N/A – No forest sites or suppliers visited during this evaluation

Site name
Ferme Chouinard
Site location
Notre Dame du Nord
Site description
Harvesting and forest Management
Rationale and focus of visit
Sampling of the supplier
Description of audit activity
Verification of BMP's implementation

Site name
Les Arbres de l'Est
Site location
Notre Dame du Lac
Site description
Harvesting and forest Management
Rationale and focus of visit
Sampling of suppliers
Description of audit activity
Verification of BMP's implementation

5.5 Describe audit sampling methodology used

Refer to the audit itinerary above. For all SBP evaluations, SCS may collect evidence using a combination of direct observation, document and record review, and interviews with stakeholders, rightsholders and the organization's personnel & service providers. As reviewing all operations would be cost-prohibitive, SCS implements sampling techniques to ensure that all CCPs are assessed during evaluations. When relevant, other areas and locations are sampled during sequential audits to ensure that different aspects of the organization's control systems are evaluated. For feedstock suppliers, a sample was determined based on the type of feedstock (e.g., primary, secondary, tertiary) for a total of 3 records. The BP uses software to track all inputs per legal and COC control system requirements to populate its credit account. Information for certified suppliers was verified. Interviews with staff and service provider(s) were held to determine effectiveness of training and to confirm implementation of procedures and verify training records. Greenhouse Gas (GHG) data included in the SAR was verified through a sample of Excel spreadsheets, utility invoices, lab reports, and the BP's volume credit account.

5.6 CB stakeholder engagement

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

N/A

5.7 Stakeholder feedback and response

☒ N/A – Certification Body stakeholder consultation not applicable for this evaluation

5.8 Main strengths and weaknesses of the management system and operations

trengths:
The organization has a very comprehensive and detailed management and procedural system in place which covers all aspects of the SBP audit scope and the underlyingFSC chain of custody certification. The databases to keep track of qualitative and quantitative information are well managed, readily accessible and featured all information as requested by the auditor. Procedures, records on paper were also easily accessible throughout the audit. The interviewed Chain of Custody Administrator has very good knowledge of all processes and requirements needed to achieve conformity to the SBP standards included in the scope of the certificate. All other personnel involved showed good awareness of requirements pertaining to their roles.

Weaknesses:
Refer to audit findings, as applicable

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☐ N/A – Standard 1 not in the scope of the evaluation

The SBE depends highly on provincials and states legal frameworks, most of which are complete enough to ensure compliance. The BP implements control measures to ensure compliance to legal requirements, such as contracts, supplier declarations, and internal and supplier audits. Other elements of the SBE depends on risk analyses and publications on common forest practices and trends of the region.

The current definition of scope is adequate for the specific characteristics of the Supply Base and management systems in place.

The means of verification and evidence provide enough evidence to support the risk conclusion.

The mitigation measures implemented for specified risk are sufficient and adequate.

The personnel involved in the development of the Supply Base Evaluation (SBE) is knowledgeable in the required fields.

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and REDII

☐ N/A – processing residues and/or post-consumer feedstock not used.
{{_PSR20_summary_standard2_-1}}

5.11 Summary of evaluation activities for chain of custody system per Standard 4

Tour of the site, Verification of supplier documentation, Interviews

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

The BP maintains records of feedstock supply, power and fuel usage, moisture content, and transport distances and vehicles, which have been compiled into a series of Excel files for monitoring and GHG calculations. The results have been reported in the SAR

5.13 Summary of audit findings for competency of involved personnel

The BP used a staff person and a contractor to prepare the SBE. The staff person has a background in forestry and forest engineering, as well as work experience in the forest products and oil & gas sectors. The contractor is an experienced forester with a background in certification and ISO auditing. Thus, the team is well-qualified to conduct the SBE and GHG calculations.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☐ N/A – Standard 6 not in the scope
{{_PSR20_summary_standard6_-1}}

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

☐ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP's risk assessments and mitigation measures including REDII scope

Quebec

Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.

	Public forest	Private forest under the program	Private forest outside the program
1.1.1	Low risk	Low risk	Specified risk
1.1.2	Low risk	Low risk	Low risk
1.1.3	Low risk	Low risk	Low risk
1.1.4	Low risk	Low risk	Low risk
1.1.5	Low risk	Low risk	Low risk
2.1.1	Low risk	Low risk	Specified risk
2.1.2	Low risk	Low risk	Specified risk
2.1.3	Low risk	Low risk	Low risk
2.1.4	Low risk	Low risk	Low risk
2.2.1	Low risk	Low risk	Low risk
2.2.2	Low risk	Low risk	Low risk
2.2.3	Low risk	Low risk	Specified risk
2.2.4	Low risk	Low risk	Specified risk
2.2.5	Low risk	Low risk	Specified risk
2.2.6	Low risk	Low risk	Low risk
2.2.7	Low risk	Low risk	Low risk
2.2.8	Low risk	Low risk	Low risk
2.2.9	Low risk	Low risk	Low risk
2.2.10	Low risk	Low risk	Specified risk
2.2.11	Low risk	Low risk	Low risk
2.2.12	Low risk	Low risk	Low risk
3.1.1	Low risk	Low risk	Low risk
3.2.1	Low risk	Low risk	Low risk
3.2.2	Low risk	Low risk	Specified risk
3.2.3	Low risk	Low risk	Low risk
3.3.1	Low risk	Low risk	Low risk
4.1.1	Low risk	Low risk	Low risk
4.1.2	Low risk	Low risk	Low risk

4.1.3	Low risk	Low risk	Low risk
4.1.4	Low risk	Low risk	Low risk
4.1.5	Low risk	Low risk	Low risk
4.1.6	Low risk	Low risk	Low risk
4.1.7	Low risk	Low risk	Low risk
4.1.8	Low risk	Low risk	Low risk
4.1.9	Low risk	Low risk	Low risk
4.1.10	Low risk	Low risk	Low risk
4.2.1	Low risk	Low risk	Low risk
4.2.2	Low risk	Low risk	Low risk
4.2.3	Low risk	Low risk	Low risk
4.2.4	Low risk	Low risk	Low risk
4.2.5	Low risk	Low risk	Low risk
4.2.6	Low risk	Low risk	Low risk
4.2.7	Low risk	Low risk	Low risk

Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.

	Public forest	Private forest under the program	Private forest outside the program
1.1.1	Low risk	Low risk	Low risk
1.1.2	Low risk	Low risk	Low risk
1.1.3	Low risk	Low risk	Low risk
1.1.4	Low risk	Low risk	Low risk
1.1.5	Low risk	Low risk	Low risk
2.1.1	Low risk	Low risk	Low risk
2.1.2	Low risk	Low risk	Low risk
2.1.3	Low risk	Low risk	Low risk
2.1.4	Low risk	Low risk	Low risk
2.2.1	Low risk	Low risk	Low risk
2.2.2	Low risk	Low risk	Low risk
2.2.3	Low risk	Low risk	Low risk
2.2.4	Low risk	Low risk	Low risk
2.2.5	Low risk	Low risk	Low risk
2.2.6	Low risk	Low risk	Low risk
2.2.7	Low risk	Low risk	Low risk
2.2.8	Low risk	Low risk	Low risk
2.2.9	Low risk	Low risk	Low risk
2.2.10	Low risk	Low risk	Low risk

2.2.11	Low risk	Low risk	Low risk
2.2.12	Low risk	Low risk	Low risk
3.1.1	Low risk	Low risk	Low risk
3.2.1	Low risk	Low risk	Low risk
3.2.2	Low risk	Low risk	Low risk
3.2.3	Low risk	Low risk	Low risk
3.3.1	Low risk	Low risk	Low risk
4.1.1	Low risk	Low risk	Low risk
4.1.2	Low risk	Low risk	Low risk
4.1.3	Low risk	Low risk	Low risk
4.1.4	Low risk	Low risk	Low risk
4.1.5	Low risk	Low risk	Low risk
4.1.6	Low risk	Low risk	Low risk
4.1.7	Low risk	Low risk	Low risk
4.1.8	Low risk	Low risk	Low risk
4.1.9	Low risk	Low risk	Low risk
4.1.10	Low risk	Low risk	Low risk
4.2.1	Low risk	Low risk	Low risk
4.2.2	Low risk	Low risk	Low risk
4.2.3	Low risk	Low risk	Low risk
4.2.4	Low risk	Low risk	Low risk
4.2.5	Low risk	Low risk	Low risk
4.2.6	Low risk	Low risk	Low risk
4.2.7	Low risk	Low risk	Low risk

New Brunswick

Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.

	Provincial	Crown License	Industrial Private	Private Woodlots
1.1.1	Low risk	Low risk	Low risk	Low risk
1.1.2	Low risk	Low risk	Low risk	Low risk
1.1.3	Low risk	Low risk	Low risk	Low risk
1.1.4	Low risk	Low risk	Low risk	Low risk
1.1.5	Low risk	Low risk	Low risk	Low risk
2.1.1	Low risk	Low risk	Low risk	Low risk
2.1.2	Low risk	Low risk	Low risk	Low risk
2.1.3	Low risk	Specified risk	Specified risk	Specified risk

2.1.4	Low risk	Specified risk	Specified risk	Specified risk
2.2.1	Low risk	Low risk	Specified risk	Specified risk
2.2.2	Low risk	Low risk	Specified risk	Specified risk
2.2.3	Low risk	Low risk	Specified risk	Specified risk
2.2.4	Low risk	Low risk	Low risk	Low risk
2.2.5	Low risk	Low risk	Low risk	Low risk
2.2.6	Low risk	Low risk	Low risk	Low risk
2.2.7	Low risk	Low risk	Low risk	Low risk
2.2.8	Low risk	Low risk	Low risk	Specified risk
2.2.9	Low risk	Low risk	Specified risk	Low risk
2.2.10	Low risk	Low risk	Specified risk	Specified risk
2.2.11	Low risk	Low risk	Low risk	Low risk
2.2.12	Low risk	Low risk	Low risk	Low risk
3.1.1	Low risk	Low risk	Low risk	Low risk
3.2.1	Low risk	Low risk	Low risk	Low risk
3.2.2	Low risk	Low risk	Specified risk	Specified risk
3.2.3	Low risk	Specified risk	Specified risk	Specified risk
3.3.1	Low risk	Low risk	Low risk	Low risk
4.1.1	Low risk	Low risk	Low risk	Low risk
4.1.2	Low risk	Low risk	Low risk	Low risk
4.1.3	Low risk	Low risk	Low risk	Low risk
4.1.4	Low risk	Low risk	Low risk	Low risk
4.1.5	Low risk	Low risk	Low risk	Low risk
4.1.6	Low risk	Low risk	Low risk	Low risk
4.1.7	Low risk	Low risk	Low risk	Low risk
4.1.8	Low risk	Low risk	Specified risk	Specified risk
4.1.9	Low risk	Low risk	Low risk	Low risk
4.1.10	Low risk	Low risk	Low risk	Specified risk
4.2.1	Low risk	Low risk	Specified risk	Specified risk
4.2.2	Low risk	Low risk	Low risk	Low risk
4.2.3	Low risk	Low risk	Low risk	Low risk
4.2.4	Low risk	Specified risk	Specified risk	Low risk
4.2.5	Low risk	Low risk	Low risk	Low risk
4.2.6	Low risk	Specified risk	Specified risk	Low risk
4.2.7	Low risk	Low risk	Low risk	Low risk

Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures

Provincial Crown License Industrial Private Private Woodlots

1.1.1	Low risk	Low risk	Low risk	Low risk
1.1.2	Low risk	Low risk	Low risk	Low risk
1.1.3	Low risk	Low risk	Low risk	Low risk
1.1.4	Low risk	Low risk	Low risk	Low risk
1.1.5	Low risk	Low risk	Low risk	Low risk
2.1.1	Low risk	Low risk	Low risk	Low risk
2.1.2	Low risk	Low risk	Low risk	Low risk
2.1.3	Low risk	Low risk	Low risk	Low risk
2.1.4	Low risk	Low risk	Low risk	Low risk
2.2.1	Low risk	Low risk	Low risk	Low risk
2.2.2	Low risk	Low risk	Low risk	Low risk
2.2.3	Low risk	Low risk	Low risk	Low risk
2.2.4	Low risk	Low risk	Low risk	Low risk
2.2.5	Low risk	Low risk	Low risk	Low risk
2.2.6	Low risk	Low risk	Low risk	Low risk
2.2.7	Low risk	Low risk	Low risk	Low risk
2.2.8	Low risk	Low risk	Low risk	Low risk
2.2.9	Low risk	Low risk	Low risk	Low risk
2.2.10	Low risk	Low risk	Low risk	Low risk
2.2.11	Low risk	Low risk	Low risk	Low risk
2.2.12	Low risk	Low risk	Low risk	Low risk
3.1.1	Low risk	Low risk	Low risk	Low risk
3.2.1	Low risk	Low risk	Low risk	Low risk
3.2.2	Low risk	Low risk	Low risk	Low risk
3.2.3	Low risk	Low risk	Low risk	Low risk
3.3.1	Low risk	Low risk	Low risk	Low risk
4.1.1	Low risk	Low risk	Low risk	Low risk
4.1.2	Low risk	Low risk	Low risk	Low risk
4.1.3	Low risk	Low risk	Low risk	Low risk
4.1.4	Low risk	Low risk	Low risk	Low risk
4.1.5	Low risk	Low risk	Low risk	Low risk
4.1.6	Low risk	Low risk	Low risk	Low risk
4.1.7	Low risk	Low risk	Low risk	Low risk
4.1.8	Low risk	Low risk	Low risk	Low risk
4.1.9	Low risk	Low risk	Low risk	Low risk
4.1.10	Low risk	Low risk	Low risk	Low risk
4.2.1	Low risk	Low risk	Low risk	Low risk
4.2.2	Low risk	Low risk	Low risk	Low risk
4.2.3	Low risk	Low risk	Low risk	Low risk

4.2.4	Low risk	Low risk	Low risk	Low risk
4.2.5	Low risk	Low risk	Low risk	Low risk
4.2.6	Low risk	Low risk	Low risk	Low risk
4.2.7	Low risk	Low risk	Low risk	Low risk

<u>USA</u>

Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.

	US National Forest	US Private Forest
1.1.1	Low risk	Low risk
1.1.2	Low risk	Low risk
1.1.3	Low risk	Low risk
1.1.4	Low risk	Low risk
1.1.5	Low risk	Low risk
2.1.1	Low risk	Low risk
2.1.2	Low risk	Low risk
2.1.3	Low risk	Specified risk
2.1.4	Low risk	Specified risk
2.2.1	Low risk	Specified risk
2.2.2	Low risk	Low risk
2.2.3	Low risk	Low risk
2.2.4	Low risk	Low risk
2.2.5	Low risk	Low risk
2.2.6	Low risk	Low risk
2.2.7	Low risk	Low risk
2.2.8	Low risk	Low risk
2.2.9	Low risk	Low risk
2.2.10	Low risk	Low risk
2.2.11	Low risk	Low risk
2.2.12	Low risk	Low risk
3.1.1	Low risk	Low risk
3.2.1	Low risk	Low risk
3.2.2	Low risk	Low risk
3.2.3	Low risk	Low risk
3.3.1	Low risk	Low risk
4.1.1	Low risk	Low risk
4.1.2	Low risk	Low risk
4.1.3	Low risk	Low risk

4.1.4	Low risk	Low risk
4.1.5	Low risk	Low risk
4.1.6	Low risk	Low risk
4.1.7	Low risk	Low risk
4.1.8	Low risk	Low risk
4.1.9	Low risk	Low risk
4.1.10	Low risk	Low risk
4.2.1	Low risk	Low risk
4.2.2	Low risk	Low risk
4.2.3	Low risk	Low risk
4.2.4	Low risk	Low risk
4.2.5	Low risk	Low risk
4.2.6	Low risk	Low risk
4.2.7	Low risk	Low risk

Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures

	US National Forest	US Private Forest
1.1.1	Low risk	Low risk
1.1.2	Low risk	Low risk
1.1.3	Low risk	Low risk
1.1.4	Low risk	Low risk
1.1.5	Low risk	Low risk
2.1.1	Low risk	Low risk
2.1.2	Low risk	Low risk
2.1.3	Low risk	Low risk
2.1.4	Low risk	Low risk
2.2.1	Low risk	Low risk
2.2.2	Low risk	Low risk
2.2.3	Low risk	Low risk
2.2.4	Low risk	Low risk
2.2.5	Low risk	Low risk
2.2.6	Low risk	Low risk
2.2.7	Low risk	Low risk
2.2.8	Low risk	Low risk
2.2.9	Low risk	Low risk
2.2.10	Low risk	Low risk
2.2.11	Low risk	Low risk
2.2.12	Low risk	Low risk
3.1.1	Low risk	Low risk

3.2.1	Low risk	Low risk
3.2.2	Low risk	Low risk
3.2.3	Low risk	Low risk
3.3.1	Low risk	Low risk
4.1.1	Low risk	Low risk
4.1.2	Low risk	Low risk
4.1.3	Low risk	Low risk
4.1.4	Low risk	Low risk
4.1.5	Low risk	Low risk
4.1.6	Low risk	Low risk
4.1.7	Low risk	Low risk
4.1.8	Low risk	Low risk
4.1.9	Low risk	Low risk
4.1.10	Low risk	Low risk
4.2.1	Low risk	Low risk
4.2.2	Low risk	Low risk
4.2.3	Low risk	Low risk
4.2.4	Low risk	Low risk
4.2.5	Low risk	Low risk
4.2.6	Low risk	Low risk
4.2.7	Low risk	Low risk

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
Indicator
1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Specified risk description
For activities in private forests without the use of management assistance programs, there is no effective monitoring system to ensure compliance with regulatory requirements. Consequently, the risk is Specified.
Detailed description of a mitigation measure

Implementation of mechanisms ensuring that the wood supply does not come from areas where there are violations of traditional or civil right: .Implementation of a Due Diligence System that includes the identification of areas under treaty, land claim or potential situations of traditional or civil rights violations. ·Due Diligence System subject to annual review. ·Weekly follow-up of regional news on Aboriginal peoples and more particularly related to Mi'kmaq, Malécites and Huron-wendat communities. ·Internal communication relating to potential or actual conflict situations within the Lebel Énergie supply territory; from the field staff to the Wood procurement Director of the Lebel Group. ·Process for handling complaints with a stop-timber purchase clause
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
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.
Specified risk description
In the case of activities in private forests without the use of management assistance programs, a certain risk is posed by the absence of documentation or supervision by forestry professionals.
Detailed description of a mitigation measure
Implementation of a Due Diligence System that includes the identification and mapping of the 6 categories of HCVs potentially found on the wood procurement territory. Due Diligence System subject to annual review
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
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.

Specified risk description
There is a definite risk in private forests without the use of management assistance programs that the threats and impacts on the main species, natural habitats, ecosystems and areas of high conservation value (HCV) relating to biodiversity in the supply area will not be identified and assessed.
Detailed description of a mitigation measure
Implementation of a Due Diligence System that includes the identification and mapping of the 6 categories of HCVs potentially found on the wood procurement territory. Due Diligence System subject to annual review
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
The risk is Specified for activities carried out in private forests without recourse to management assistance programs, due to the absence of public data and documented monitoring of soil protection.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope

Quebec-Private forest outside the program
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.
Specified risk description
Since no laws or practices have been associated with biomass harvesting in private forests, the analysis concludes that there is a definite risk for this tenure.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
There is no public database to validate the soil protection of activities carried out in private forests without recourse to management assistance programs
Detailed description of a mitigation measure
When harvesting forests for biomass by removing residue on harvested sites, Lebel Énergie will verify that negative impacts on biodiversity, water environments and soil and stand productivity are minimized for each supplier that: · . Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Deliver more than 500 MT/year

Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess that all values important for biodiversity were identified and protected.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
Indicator
2.2.10 Harvested areas shall be regenerated
Specified risk description
There is no public database to validate the regeneration of stands after final felling carried out without recourse to management aid programs.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
Quebec-Private forest outside the program
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.

Specified risk description
In the case of activities in private forests without recourse to management assistance programs, it is impossible to assess compliance with regulatory requirements or whether activities are adequately addressing this issue in the absence of a documented monitoring system.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick
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.
Specified risk description
There is an extensive federal and provincial regulatory framework governing biodiversity values. On industrial private land and private woodlots, due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, and a precautionary approach is applied
Detailed description of a mitigation measure
Implementation of a Due Diligence System that includes the Identification and management of potential threats to the 6 categories of HCV potentially found on the wood procurement territory.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
Canada

Area/Sub-Scope
New Brunswick-Industrial Private, Private Woodlots
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.
Specified risk description
Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework, and results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk on industrial private land and private woodlots in New Brunswick
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick-Industrial Private, Private Woodlots
Indicator
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
Indicator also has a specified risk designation for industrial private land in New Brunswick. Two of the six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem, (2.2.3 – Soil Quality Maintained or Enhanced and 2.2.10 – Regen After Harvest) have a specified risk designation for private woodlots in New Brunswick. As such, this Indicator also has a specified risk designation for private woodlots in New Brunswick.
Detailed description of a mitigation measure
For suppliers that:

· .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick-Industrial Private,Private Woodlots
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
Industrial Private Land Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of soil quality, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick. Private Woodlots Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of soil quality, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private woodlots in in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country

Canada	

Area/Sub-Scope
New Brunswick-Private Woodlots
Indicator
2.2.8 Waste shall be disposed of in an environmentally appropriate manner.
Specified risk description
On private woodlots, the provincial legislation related to the waste management is comprehensive. Due to a lack of evidence to implementation mechanisms and/or results to verify current condition of waste management, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private woodlots in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick- Industrial Private
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.
Specified risk description
Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of harvest levels, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging

professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick-Industrial Private, Private Woodlots
Indicator
2.2.10 Harvested areas shall be regenerated
Specified risk description
Industrial Private Land Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of regeneration following timber harvesting, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick. Private Woodlots There is evidence that regeneration activities are completed on private woodlots that participate in the Private Woodlots Silviculture Program, however, the level of participation is not being applied consistently across private woodlots in NB. Most private woodlot areas harvested are naturally regenerated, and there is no systematic survey of regeneration that would attest to the adequacy of stocking. Due to a lack of results, a precautionary approach is applied and this Indicator has been designated as specified risk for private woodlots in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick-Industrial Private,Private Woodlots
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.
Specified risk description
Industrial Private Land Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of timber harvesting from low-productive or difficult to regenerate sites, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick. Private Woodlots Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of timber harvesting from low-productive or difficult to regenerate sites, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private woodlots in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick
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).
Specified risk description

The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive (Details provided in Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced). There is no regulatory framework specific to the management of high carbon stocks. A specified risk designation was applied to Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown license, industrial private land and private woodlots. Additionally, there is a lack of evidence to support implementation mechanisms, an oversight/monitoring framework, and/or results to verify the identification and the subsequent avoidance of harvesting of primary feedstock from forests that have combined attributes of high carbon stocks and high conservation values on Crown license, industrial private land and private woodlots. Given the lack of evidence, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown license, industrial private land and private woodlots in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick-Industrial Private, Private Woodlots
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.
Specified risk description
At the professional level, mandatory requirements are set for standards of conduct, continuing competency development, and annual competence assessments. ARPFNB's regulatory framework ensures the ongoing training and competence of forest professionals registered to practice in NB. At the forest worker level, due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify training for forest workers related to roles and responsibilities, a precautionary approach is applied. As such, this Indicator is designated as specified risk at the provincial level in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging

professionals as defined by SFI, and
· .Operate on private forests managed without the support of a Development Program, and
· .Deliver more than 500 MT/year

Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.

Detailed description of CB evaluation of mitigation measure and its conclusions

Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada
Area/Sub-Scope
New Brunswick-Private Woodlots
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.
Specified risk description
Several individuals or small businesses operating on private woodlots in NB and are not, required to be WorkSafeBC registered. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results to verify safeguards are in place to protect the health and safety of workers, this Indicator is designated as specified risk for other private land in New Brunswick.
Detailed description of a mitigation measure
For suppliers that: · .Do not hold an ISO or CEAF environmental certificate or are not qualified logging professionals as defined by SFI, and · .Operate on private forests managed without the support of a Development Program, and · .Deliver more than 500 MT/year Lebel Énergie will verify at least one harvesting site per year to monitor the quality of the operations and assess their environmental impacts.
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate, however there is no evidence of verification of at least one harvesting site

Country
Canada

Area/Sub-Scope
New Brunswick-Industrial Private, Private Woodlots
Indicator
4.2.1 Negative social and community impacts shall be identified and avoided.
Specified risk description
Industrial Private Land Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick. Private Woodlots Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private woodlots in New Brunswick
Detailed description of a mitigation measure
Complaint mecanism and stakeholder consultation
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
Canada
Area/Sub-Scope
New Brunswick-Crown License and Industrial Private
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.
Specified risk description
Mi'kmaq and Wolastoqey Nations land title assertions are in the court system against the Crown and industrial private land owners, and there are on-going lawsuits related to forest management. Due to this, the documentation and respecting of traditional tenure and use rights of First Nations cannot be verified. Based on evidence reviewed, this Indicator is designated as specified risk for Crown licenses and industrial private land in New Brunswick. First Nations have not asserted tenure and use rights on private woodlots. As such, this Indicator is designated as low risk for private woodlots in New Brunswick.
Detailed description of a mitigation measure
Complaint mecanism and public consulatation
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
Canada

Area/Sub-Scope
New Brunswick-Crown License and Industrial Private
Indicator
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.
Specified risk description
Currently there is no publicly available information on consultation on AOPs and FMPs. Consultation with First Nations on AOPs is starting in the 2024/25 year. Because forestry consultation is not implemented, nor are outcomes known, this Indicator is designated as specified risk on Crown licenses. First Nations have asserted Aboriginal title rights on industrial private land, and the matter is before the courts. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition verifying consultation/accommodation are in place, a precautionary approach is applied. As such, this Indicator is designated as specified risk for for industrial private land in New Brunswick. First Nations have not asserted tenure and land use rights on private woodlots and there are no requirements for consultation / accommodation. As such, this Indicator is designated as low risk for private woodlots in New Brunswick.
Detailed description of a mitigation measure
Complaint mecanism and stakeholder consultation
Detailed description of CB evaluation of mitigation measure and its conclusions
Mitigation measures are adequate and implemented

Country
United States
Area/Sub-Scope
US Private Forest
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.
Specified risk description
This analysis indicates the ESA is a highly efficient system for the maintenance and enhancement of Federally listed threatened and endangered animal species. However, there is specified risk for the following due to lack of regulatory safeguards and/or resources/incentives for maintenance and enhancement of the following: - Nature Serve Network identified G1-G2 animal species not on the ESA threatened or endangered list, G1-G2 plant species (Figure 2.1.3.-1), and - FSC US NRA identified species, ecosystems, and HCVs (Figure 2.1.3.-2)
Detailed description of a mitigation measure
Implementation of a Due Diligence System that includes the identification and mapping of the 6 categories of HCVs potentially found on the wood procurement territory. Due Diligence System subject to annual review
Detailed description of CB evaluation of mitigation measure and its conclusions

Mitigation measures are adequate and implemented

Country
United States
Area/Sub-Scope
US Private Forest
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.
Specified risk description
Forests: While there is consensus that deforestation rates are quite low in the US and for the RRA geography, analysis of FIA for the given time period indicates net loss of timberland for the RRA geography of less than 1% (0.75%) with localized losses and gains. Similarly, using methodology based on population growth and issuance of housing permits, which is not based on change detection analysis of the forest itself, the FSC US NRA specified risk for a set of counties within the RRA's geography. Despite relatively low rates of forest loss, with recognition to the precedence of the FSC US NRA and the results of original analysis for the RRA's geography, risk is specified as it relates to forests in this Indicator (See Figure 2.2.1.-1 and Table 2.2.1.-1).
Detailed description of a mitigation measure
No procurement from areas identified with specified risk
Detailed description of CB evaluation of mitigation measure and its conclusions
No procurement from areas identified with specified risk