



Supply Base Report:

Pinnacle Renewable Energy Inc (Smithers Pellet Limited Partnership) Third 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 (Smithers Pellet Limited Partnership)
Producer address:	1723 Dahlie Road, V0J 2N0 Smithers, Canada
SBP Certificate Code:	SBP-06-59
Geographic position:	54.766300, -127.155900
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:	14 Jul 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
Feedstock origin (countries)	Canada (British Columbia)
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.

Smithers Pellet Limited Partnership is a pellet plant with 3 presses able to produce approximately 110000 MT per year, the plant has been running since 2018. 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: 23

Annual maximum production capacity (metric tonnes): 110000

Number of direct feedstock suppliers: 3

Approximate number of feedstock sub-suppliers: 2

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	British Columbia
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), 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:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	65.0000

Map(s) of the Supply Base area:

2.3 Feedstock information

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

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

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

<i>Picea engelmannii</i>	Engelmann Spruce
<i>Picea glauca</i>	White Spruce
<i>Picea mariana</i>	Black Spruce
<i>Picea sitchensis</i>	Sitka Spruce
<i>Abies lasiocarpa</i>	Subalpine Fir
<i>Pseudotsuga menziesii</i>	Douglas-fir
<i>Abies grandis</i>	Grand Fir
<i>Abies amabilis</i>	Amabilis Fir
<i>Pinus contorta</i>	Lodgepole Pine
<i>Pinus ponderosa</i>	Ponderosa Pine
<i>Pinus monticola</i>	Western White Pine
<i>Thuja plicata</i>	Western Red Cedar
<i>Chamaecyparis nootkatensis</i>	Yellow Cedar
<i>Tsuga heterophylla</i>	Western Hemlock
<i>Tsuga mertensiana</i>	Mountain Hemlock
<i>Larix laricina</i>	Tamarack
<i>Larix lyallii</i>	Alpine Larch
<i>Larix occidentalis</i>	Western Larch
<i>Juniperus scopulorum</i>	Rocky Mountain Juniper
<i>Taxus brevifolia</i>	Western Yew
<i>Betula papyrifera</i>	Paper Birch
<i>Populus trichocarpa</i>	Black Cottonwood
<i>Populus balsamifera</i>	Balsam Poplar
<i>Populus tremuloides</i>	Trembling Aspen
<i>Alnus rubra</i>	Red Alder

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 while Alberta has area-based tenures with crown Forest Management Agreements to distribute the right to harvest. 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-commitment-reports-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/2023-2024/provincial_summary.pdf Alberta Forest Management Agreement Decision Policy - <https://open.alberta.ca/dataset/1abc25cd-a464-47c0-add9-57599d16baa2/resource/e534b659-c0d4-4da5-91c3-829aef681fc1/download/afred-forest-management-agreement-decision-policy-2022-03.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/bark-beetles/bark_beetle_management_guidebook.pdf

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 7.43

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 92.57

g. Proportion of feedstock composed of or derived from saw logs by weight (%): 4.71

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: 0

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:

67.00 % SFI

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 Assessment for British Columbia for summary.

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: 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:

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 re-verification. 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:

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

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: British Columbia

Risk Assessment used:

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

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Canada
Area	British Columbia
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See Interim BC RRA Indicator 2.2.10 (Regeneration) for a full assessment (and mitigation measures) relating to forest regeneration of harvested areas for the supply base. This indicator in Annex 1 was used to derive the following risk ratings: British Columbia: - Public Land (Low Risk) - Private Managed Forest (Low Risk) - Other Private Land (Specified Risk) https://sbpcert.wpenginepowered.com/wp-content/uploads/2025/05/SBPRRA-CA-BC-FOR_v2.0-RRA-for-British-Columbia-FOR_Interim.pdf
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing	N/A

area	
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See Interim BC RRA Indicators 2.2.2 (Ecosystem Health), 2.2.3 (Soil Quality), 2.2.4 (Harvest Residues) & 2.2.9 (Harvest Levels) in Annex 1 for a full assessment (and associated mitigation measures) on ensuring that harvesting is carried out considering maintenance of soil quality & biodiversity in the supply base. These indicators in Annex 1 were used to derive the following risk ratings: Other Private Land: - 2.2.2 (Specified Risk) - 2.2.3 (Specified Risk) - 2.2.4 (Low Risk) - 2.2.9 (Specified Risk) https://sbpcert.wpenginepowered.com/wp-content/uploads/2025/05/SBPRRA-CA-BC-FOR_v2.0-RRA-for-British-Columbia-FOR_Interim.pdf
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See Interim BC RRA Indicators 1.1.5 (Protection from Illegal Activities), 2.1.3 (Maintain or Enhance Biodiversity), 2.2.1 (Land Conversion), 2.2.2 (Ecosystem Health), 2.2.3 (Soil Quality), 2.2.4 (Harvest Residues), 2.2.5 (Water Quality), 2.2.9 (Harvest Levels), & 2.2.10 (Regeneration) in Annex 1 for a full assessment (and associated mitigation measures) on ensuring that harvesting is carried out to maintain or improve the long term production capacity of the forests in the supply base. These indicators in Annex 1 were used to derive the following risk ratings: Public Land: - 1.1.5 (Low Risk) - 2.1.3 (Specified Risk)

	- 2.2.1 (Specified Risk) - 2.2.2 (Low Risk) - 2.2.3 (Low Risk) - 2.2.4 (Low Risk) - 2.2.5 (Low Risk) - 2.2.9 (Low Risk) - 2.2.10 (Low Risk) Private Managed Forests: - 1.1.5 (Low Risk) - 2.1.3 (Specified Risk) - 2.2.1 (Specified Risk) - 2.2.2 (Low Risk) - 2.2.3 (Low Risk) - 2.2.4 (Low Risk) - 2.2.5 (Low Risk) - 2.2.9 (Low Risk) - 2.2.10 (Low Risk) Other Private Land: - 1.1.5 (Low Risk) - 2.1.3 (Specified Risk) - 2.2.1 (Specified Risk) - 2.2.2 (Specified Risk) - 2.2.3 (Specified Risk) - 2.2.4 (Low Risk) - 2.2.5 (Specified Risk) - 2.2.9 (Specified Risk) - 2.2.10 (Specified Risk) https://sbpcert.wpenginepowered.com/wp-content/uploads/2025/05/SBPRRA-CA-BC-FOR_v2.0-RRA-for-British-Columbia-FOR_Interim.pdf
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	vi (1) - Old Growth & Primary Forest Old Growth & Primary Forests: In 2015, the FAO released the 5 year Forest Resource Assessment reports for provinces in Canada. This report describes Primary Forest as a concept that does not apply well in Canadian forests, with Canada's forest sectors being best classified as other naturally regenerated forest. The assessment completed by FAO for Primary Forest within this report covers forested areas within parks and other protected areas. The 2020 version of the report updates this number with a slight reduction of Primary Forest to exclude areas within parks and other protected areas adjacent to roads, as the assumption is they should not be classified as Primary Forest. Based on the FAO reports, the forest type in the harvestable supply base should be considered as Other Naturally Regenerated Forest. To address Old Growth & Primary Forests in the BP's supply chain, the Parks & Protected Areas spatial layer will be used as a proxy for this value to remain consistent with the FAO Forest Resource Assessment reports. In Phase 1 of the Monitoring Forest Feedstock mitigation measure, the BP will include a spatial review of all proposed harvest units in relation to Parks & Protected Areas in the province. If the proposed harvest unit is overlapping or within 10m of any Parks & Protected Areas, the Sustainability Team will reject the potential fiber source. If the proposed harvest unit does not overlap with or is >10m from Parks & Protected Areas, the Sustainability Team will consider the risk for fiber from Primary Forest mitigated & approve the fiber source. Approved fiber sources will be included in a list of harvest units eligible for field verification through Phase 2 of the Monitoring Forest Feedstock mitigation measure. For the purposes of this indicator, the Sustainability Team will use the following spatial data layers from BC's Geographic Warehouse[1] (BCGW) as a proxy for the BP's definition of Primary Forest: • *Old Growth Management Areas - Legal - Current*[2] (OGMA) o This data represents legally established and spatially defined areas of old growth forest that are identified during landscape unit planning or an operational planning process. Forest licensees are required to maintain legally established OGMA's when preparing FSPs. Harvesting in OGMA's is constrained to meet biodiversity targets. • *WCP Wildlife Habitat Area Poly*[3] (WHA) o The dataset contains approved legal boundaries for wildlife habitat areas and specified areas for species at risk and regionally important wildlife. Additional information including approved orders associated with WHAs is available [here] (http://www.env.gov.bc.ca/cgi-bin/apps/faw/wharesult.cgi?search=show_approved)(http://www.env.gov.bc.ca/cgi-bin/apps/faw/wharesult.cgi?search=show_approved)). The use of this dataset for the definition of Primary Forest are WHAs that are designated as NO HARVEST ZONES. • *WCP Ungulate Winter Range SP*[4]* (Approved UWR) o A mapped area of habitat with

associated species-specific management requirements. These areas have been approved under the authority of the Forest Practices Code and the Forest and Range Practices Act. This is a logical entity and not implemented physically. A mapped area of habitat required for the winter survival of ungulate species. Associated with the mapped areas are species-specific management requirements. These areas have been approved under the authority of the Forest Practices Code and the Forest and Range Practices Act. The use of this dataset for the definition of Primary Forest are UWRs that are designated as NO HARVEST ZONES.

- *TA Park Ecores PA SVW*[5]** (Parks, Ecological Reserves, & Protected Areas) o This dataset contains parks and protected areas managed for important conservation values and are dedicated for the preservation of their natural environments for the inspiration, use and enjoyment of the public. Places of special ecological importance are designated as ecological reserves for scientific research and educational purposes.
- CLAB_NATPK[6] (National Parks) o This dataset provides the administrative boundaries of National Parks and National Park Reserves within the province of British Columbia. Administrative boundaries were compiled from Legal Surveys Division's cadastral datasets and survey records archived in the Canada Lands Survey Records. Canada Lands Administrative Boundaries (CLAB) were adjusted to match British Columbia's authoritative base mapping features. The Fresh Water Atlas (FWA) was used for streams, rivers, coastlines, and height of land. The Integrated Cadastral Fabric (ICF) was used for parcel boundaries. Tantalus Cadastre was used where ICF parcels were not available.
- *FADM Designated Areas*[7]** (FA Part 13 Designated Areas) o This dataset defines areas protected from harvesting activities by Order-in-Council as per part 13 of the Forest Act.

[1] Link to BCGW webpage: [Data Catalogue (gov.bc.ca)](<https://catalogue.data.gov.bc.ca/>) [2] Link to OGMA webpage: [Old Growth Management Areas - Legal - Current - Datasets - Data Catalogue (gov.bc.ca)](<https://catalogue.data.gov.bc.ca/dataset/old-growth-management-areas-legal-current>) [3] Link to WHA webpage: [Wildlife Habitat Areas - Approved - Datasets - Data Catalogue](<https://catalogue.data.gov.bc.ca/dataset/b19ff409-ef71-4476-924e-b3bcf26a0127>) [4] Link to Approved UWRs webpage: [Ungulate Winter Range - Approved - Datasets - Data Catalogue](<https://catalogue.data.gov.bc.ca/dataset/712bd887-7763-4ed3-be46-cdaca5640cc1>) [5] Link to the BC Parks, Eco Reserves & Protected Areas webpage: [BC Parks, Ecological Reserves, and Protected Areas - Datasets - Data Catalogue](<https://catalogue.data.gov.bc.ca/dataset/1130248f-f1a3-4956-8b2e-38d29d3e4af7>) [6] Link to the National Parks within British Columbia webpage: <https://catalogue.data.gov.bc.ca/dataset/national-parks-of-canada-within-british-columbia/resource/90e1e264-38c2-496a-b108-dc44057a2999>

	b108-dc44057a2999) [7] Link to the FADM Designated Areas webpage: [FADM - Designated Areas - Datasets - Data Catalogue](https://catalogue.data.gov.bc.ca/dataset/01779d10-7a9a-4d9c-8b5c-80acc30dda81)
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	vi (2) - Highly Biodiverse Forest See Interim BC RRA Indicators 2.1.3 (Maintain or Enhance Biodiversity) & 3.2.3 (HCV & HCS) in Annex 1 for a full assessment (and associated mitigation measures) on protection of areas designated for nature protection purposes in the supply base. These indicators in Annex 1 were used to derive the following risk ratings: All Sub-Scopes: - 2.1.3 (Specified Risk) - 3.2.3 (Specified Risk) [https://sbpcert.wpenginepowered.com/wp-content/uploads/2025/05/SBPRRA-CA-BC-FOR_v2.0-RRA-for-British-Columbia-FOR_Interim.pdf](https://sbpcert.wpenginepowered.com/wp-content/uploads/2025/05/SBPRRA-CA-BC-FOR%5C_v2.0-RRA-for-British-Columbia-FOR%5C_Interim.pdf)
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing	N/A

area	
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR

Level B management system at the level of the forest sourcing area	N/A
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-BC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

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 = $\sqrt{(x)*0.8}$

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).