Compliance with the SBP Framework: Public Summary Report

Control Union Certifications BV Evaluation of Pinnacle Renewable Energy Inc (Northern Pellet Limited Partnership)

First Surveillance Audit

Sustainable Biomass Program
sbp-cert.org

Completed in accordance with the CB Public Summary Report Template Version 2.1 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

Document history

Version 2.0	**Published 10 August 2023**
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1 Overview

Certification Body (CB) Name:	Control Union Certifications BV
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Audit team leader:	Henrique Silva
Audit team members:	Just-Christ YIMGANG
Name of the Company:	Pinnacle Renewable Energy Inc (Northern Pellet Limited Partnership)
Company legal address:	9401 - 124th Avenue, T0H 1Z0 High Level, Canada
Company contact for SBP:	Joseph Aquino
Company contact email:	Joseph.Aquino@drax.com
Company website:	https://www.drax.com/northamerica/?source=pinnacle
Date of installation:	27 Apr 2026
SBP Certificate Code:	SBP-06-63
Date of certificate issue:	31 Oct 2025
Date of certificate expiry:	30 Oct 2030

Audit closing meeting date:	22 May 2026
Audit cycle:	First Surveillance Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Bruna Scarparo
Date of decision:	17 Aug 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 9513	NC Grading: Observation
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	3.2 The Organisation shall identify the applicable requirements of this Standard using the table in Standard 2, p3.2. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
The Organisation receives part of its primary feedstock under certification schemes recognised by SBP, including FSC, PEFC and SFI. Based on this, the Organisation applies the SBP benchmarking approach and, therefore, the requirement is considered compliant. However, the benchmarking relationship between SBP and SFI is not fully clear, as there is currently no official and formally approved benchmarking document available between the two schemes. During the audit, the Organisation demonstrated a good level of understanding regarding both certification systems and was able to identify areas where certain SBP Standard 1 requirements may not be fully covered by SFI requirements. Nevertheless, this assessment and justification process could be more formally documented in order to strengthen the robustness and transparency of the Organisation's evaluation process regarding compliance with SBP requirements.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number 9514	NC Grading: Observation
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	Annex 1; 1.1 The Organisation shall conduct a verification process for its suppliers of processing residues and post-consumer feedstock to determine whether this feedstock is eligible for the SBE exemptions mentioned in 3.2 above. N/A

	N/A N/A
Description of Non-conformance and Related Evidence:	
An evaluation identified that part of the processing residues feedstock originated from material not certified under an SBP-recognised certification scheme. In such cases, the Organisation applies the SBE approach based on the Regional Risk Assessments (RRA) for British Columbia and Alberta, where applicable. Therefore, the requirement is considered fulfilled. However, it was not fully evident how the Organisation verifies the effective implementation of the applicable SBE requirements within the sourcing activities of the supplying sawmills. The Organisation could further strengthen its verification and control mechanisms regarding supplier implementation of SBE requirements, while considering the inherent regional limitations and the existing risk assessment outcomes. This has been raised as an observation due to the very limited proportion of incoming material not covered by SBP-recognised certification schemes, resulting in an overall low associated risk.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

N/A

2.4 Notes for the next Audit

N/A

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	
Approved Standards	SBP Standard 1: Feedstock Compliance v2.0; SBP Standard 2: Feedstock Verification v2.0; SBP Standard 4: Chain of Custody v2.0; SBP Standard 5: Collection and Communication of Data v2.0; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1; Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Product Group IDs	☒ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☒ Processing residues feedstock (4A) ☒ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	Yes
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	Yes
Products	WB 1.1 Wood pellets
Feedstock origin (countries):	Canada
SBP-endorsed Regional Risk Assessments used: **Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/**	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
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	Yes
Changes in the scope	N/A

3.1 Description of the company

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

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 plant in north western Alberta. The 10 Canadian pellet plants produce wood pellets from sawmill residuals, forestry residuals and non-merchantable 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 General Manager Fibre 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, register tonnage, type and supplier in a centralized database system. Production and output are recorded in the same system, along with dump reports from the two terminals. Each port maintains a railcar log. Sale tonnage is measured in a draft survey of the vessels. Tonnage of input and output as well as mass balance are maintained by the Logistics Coordinator in the Prince George office. Based on the feedstock the company will be able to sell SBP/GGL SDE+ compliant CAT 5 biomass made from sawmill/industrial residuals and GGL material with a PEFC or PEFC controlled claim. Transaction certificate application and sale records are managed by the Sales & Logistics Coordinator at the Prince George office. The Sales and Logistics Coordinator uses the online platform offered by CUC and maintains TCs on file. 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 (OneDrax)Pinnacle Renewable Energy Inc (Northern Pellet Limited Partnership) is a pellet plant with 6 presses able to produce approximately 200 000 MT per year. The pellet plant has been in operation since 2012. In 2025, the plant produced 190753.08 MT pellets from raw materials consisting of 100% sawmill residuals . The material is shipped by railcar to the port storage facility at Prince Rupert (Westview Terminal), where the seagoing vessels are loaded. Pellet and pellet fines are used to fuel the dryer. Silo´s capacity 200 MT.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Vancouver (Central Office)	1100 – 543 Granville Street Vancouver, BC V6C 1X8	(Central Office)	☒
Northern Pellet Ltd. Partnership	9401 – 124th Ave High Level, AB T0H 1Z0	Pellet Mill	☐
Westview Terminal - Port	25 Waterfront Road Prince Rupert, BC V8J 3P6	Harbour	☐
Port of Fibreco	1209 McKeen Ave, North Vancouver, BC V7P 3H9	Harbour	☒

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

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

The Organisation is holding valid PEFC Chain of Custody certificate system which they share through a multi-site with the other pellet production facilities. Valid PEFC system description and other documents exist. The organization operates the percentage based method for controlling PEFC claims based on volume credits. Pinnacle also verifies PEFC Controlled Sources through a DDS including a risk assessment covering British Columbia. All wood fibre 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, fibre 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 organization has detailed and comprehensive procedures and databases to cover the necessary requirements regarding the SBP-approved Chain of Custody system.

4 Specific objective of the audit

- Bridging requirements of the SBP scheme for meeting REDIII
- Interviews with responsible staff
- supply base evaluation / mitigation measures as applied for the ‘specified risk’ indicators.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Henrique Silva and Just-Christ YIMGANG	4.0
2. On-site (excl. travel time)	Henrique Silva and Just-Christ YIMGANG	32.0
3. Report writing	Henrique Silva and Just-Christ YIMGANG	4.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Henrique Silva	Lead Auditor	Lead SBP, GGL,PEFC,SURE, ENPlus and FSC FM/COC auditor and successfully passed the ISO 9001 auditor training programme
Just-Christ YIMGANG	Auditor	Forestry certification professional with over 8 years of experience leading and conducting audits against SBP, FSC, PEFC, ENplus, GGL, OLB, and ISO standards across North America and Africa. Experienced in biomass certification, Chain of Custody, sustainable forest management, due diligence systems, and technical review, with a strong focus on compliance and accreditation requirements.Local forester with long experience in Canadian Forest
Craig Robinson	Local Expert	Local forester with long experience in Canadian forest

5.3 Description of evaluation activities

This was a remote and on-site audit, conducted on Aprim 27 7 to May 1st , 2026 remote and from May 11 to 22, 2026 on-site. The audit was conducted based on meeting/interviews with relevant people of the certificate holder, relevant documents and records, and other best available information. The evaluation was also conducted by means of on sites visits to a sample of sites for sourcing of primary feedstock under the SBE, on-site visit to the head office of Pinnacle and visits to the pellet plant. Interviews with secondary and tertiary feedstock suppliers were carried out remotely. The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit. After this introduction, all relevant requirements of the applicable SBP standard(s) were verified on compliance using a report template and checklists.

5.4 List of forest management units and feedstock suppliers visited

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

Site name
Blue Angel
Site location
Alberta
Site description
Recent clear cut with plantation
Rationale and focus of visit
Inspect all the operations, permits and status of the process
Description of audit activity
The visits are allways followed by elements of Pinnacle team with maps, permits and evaluations of the sustainability criteria from this site.

5.5 Describe audit sampling methodology used

All applicable and existing documents and procedures subject to the SBP certification were reviewed. All DTS registrations and associated invoices and other sales documents related to trading of the scope of SBP were reviewed During the preparation of the audit, a sample plan was developed based on the following criteria: - A review of documentation related to energy and carbon data for the chosen reporting period of the SAR. - An evaluation of DTS, inputs and outputs, invoices and transport documentation. - Inspection of the pellet plant and interviews with staff. Harvesting sites in blocks were visited and 1 secondary feedstock suppliers were also sampled and interviewed. The sampling was based on the formula n√suppliers x 0.6 used to calculate forest sites (1 out of 1). A total of 1 sawmill supplied the facility. 1 sawmill was visited: (on-site).

5.6 CB stakeholder engagement

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

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

5.7 Stakeholder feedback and response

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

5.8 Main strengths and weaknesses of the management system and operations

The audit of Pinnacle demonstrated a good level of compliance with the required criteria of Standard 1, 2, 4 and 5. Reasonable evidence was provided to support compliance with applicable requirements. The organization has a very comprehensive and detailed management and procedural system in place which covers all aspects of the SBP audit scope and the underlying PEFC chain of custody Certification and the existence of a PEFC and SFI Chain of Custody system is considered a main strength with respect to Pinnacle overall conformity with the relevant SBP standards.

Weaknesses: NCa identified in this audit.

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

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

The SBP- Interim Regional Risk Assessments for British Columbia and Alberta, Canada is used

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

As part of the SBP audit, three suppliers of processing residues were visited. During the site visits, each supplier presented and demonstrated their operational processes, with particular emphasis on the origin, nature, and handling of the processing residues supplied. Additionally, the audits previously conducted by the SBP Certificate Holder on these suppliers were reviewed and evaluated to verify compliance with SBP requirements, including the implementation of the Supply Base Evaluation (SBE), if applicable, and the adequacy of risk mitigation measures.

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

As part of the SBP audit, the evaluation of the Chain of Custody (CoC) system, conducted in accordance with Standard 4 requirements, demonstrated that the organization has implemented effective control measures. The system in place ensures traceability and integrity of SBP-compliant and SBP-controlled biomass throughout the supply chain. Procedures and records were found to be consistent with the standard's requirements, indicating a high level of compliance and control over material flows and documentation

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

The organization has in depth procedures for this in depth procedures for this. The auditor confirmed the Greenhouse Gas (GHG) sources for feedstock input from the forest, production at the facility, transportation to the port and storage and handling at the port and reviewed how the input data was measured. Findings were substantiated by on-site staff interviews with operations personnel on the overview of the operations at the facility, historical operations, changes to operations, procedures and processes used to maintain the facility, and procedures and processes used to ensure data quality. Pinnacle demonstrated full competency to analyse and report the required data on Greenhouse Gas emissions and The responsible person has benefited from previous experience with other certification schemes (like GGL) for energy data collection

5.13 Summary of audit findings for competency of involved personnel

Internal staff members are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within SBP system. All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (recognition and identification of HCVF, familiarity with health and safety requirements, timber origin verification) during the site visits. Relevant certificates and diplomas were presented during the audit. Qualification requirements for personnel involved in the SBE system are provided in documented procedures of the BP. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary feedstock sourced within the SBE. This has been based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the assessment and audits.

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

☒ N/A – Standard 6 not in the scope

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

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

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

The Intermim SBP-endorsed Regional Risk Assessments for British Columbia and Alberta, Canada has determined risks.
The company´s mitigation measures are sufficiently implemented to mitigate these risks as evidenced by the company policy, COC procedures, PEFC Due Diligence Risk Assessment, supplier agreements and verification through field visits to the forest and supplier interviews.

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Canada
Area/Sub-Scope
British Columbia - All Sub-Scopes
Indicator
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Specified risk description
Biodiversity is a complex issue; it contains elements both at the landscape-level and stand-level, and sufficiency of maintenance or enhancement is difficult to evaluate within a risk assessment process. Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced is focused on how effectively threats to key species, habitats, ecosystems and areas of high conservation value are mitigated to maintain or enhance biodiversity values. In most cases, mitigation results from some level of protection or permanence of sustenance. The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive. Legislative requirements, controls and guidance are in place to provide protection and/or allow the implementation of practices that maintain or enhance both landscape-level and stand-level biodiversity values. It should be noted that this risk assessment does not evaluate the sufficiency of the regulatory framework but evaluates its implementation for the elements of biodiversity values that are in place (See Indicator 2.1.1 Key Eco/HCV Identified Context section for details.) The Crown licensees' FSPs, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. Government programs provide oversight and monitor regulatory planning and practices for biodiversity values. There is no indication of widespread or systemic legal non-compliance. However, government oversight is focused on legal compliance with legislation for biodiversity values but not on sufficiency relative to the maintenance and enhancement of biodiversity values. This reinforces uncertainty with respect to sufficiency/uniformity of implementation across diverse Crown Land timber disposition holders. The BC government and other organizations have, and continue to, assess the maintenance and enhancement of landscape-level and stand-level biodiversity values. There are many assessments and reports covering different spatial and temporal scales. The results of this data, assessments, and reports are wide and varied, making it difficult to provide a definitive conclusion. Based on the extensive results, this risk assessment is unable to draw a sufficiency conclusion on the maintenance or enhancement of specific biodiversity values. This risk assessment does identify areas of uncertainty. In the Biodiversity is a complex issue; it contains elements both at the landscape-level and stand-level, and sufficiency of maintenance or enhancement is difficult to evaluate within a risk assessment process. Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced is focused on how effectively threats to key species,

habitats, ecosystems and areas of high conservation value are mitigated to maintain or enhance biodiversity values. In most cases, mitigation results from some level of protection or permanence of sustenance. The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive. Legislative requirements, controls and guidance are in place to provide protection and/or allow the implementation of practices that maintain or enhance both landscape-level and stand-level biodiversity values. It should be noted that this risk assessment does not evaluate the sufficiency of the regulatory framework but evaluates its implementation for the elements of biodiversity values that are in place (See Indicator 2.1.1 Key Eco/HCV Identified Context section for details.) The Crown licensees' FSPs, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. Government programs provide oversight and monitor regulatory planning and practices for biodiversity values. There is no indication of widespread or systemic legal non-compliance. However, government oversight is focused on legal compliance with legislation for biodiversity values but not on sufficiency relative to the maintenance and enhancement of biodiversity values. This reinforces uncertainty with respect to sufficiency/uniformity of implementation across diverse Crown Land timber disposition holders. The BC government and other organizations have, and continue to, assess the maintenance and enhancement of landscape-level and stand-level biodiversity values. There are many assessments and reports covering different spatial and temporal scales. The results of this data, assessments, and reports are wide and varied, making it difficult to provide a definitive conclusion. Based on the extensive results, this risk assessment is unable to draw a sufficiency conclusion on the maintenance or enhancement of specific biodiversity values. This risk assessment does identify areas of uncertainty. In the evaluation of Crown land, the most evident areas of uncertainty for the maintenance of biodiversity values are related the following: • Woodland Caribou habitat due to the incomplete recovery plan development and/or implementation; • SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion; • Intact Forest Landscapes due to lack of provincial recognition and implementation mechanism; and • Priority old growth forest deferral areas and protection has not been completed and finalized. Based on evidence reviewed and applying the precautionary approach, this Indicator is designated as specified risk for Crown land in British Columbia. There is federal and provincial regulatory framework for maintaining biodiversity values. On private managed forest land and other private land, due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land and other private land in British Columbia.

Detailed description of a mitigation measure

Context - Forest Feedstock Deliveries

Prior to receival of fiber from any Forest Feedstock (logs or bush grind) source, the Fiber Team will submit an approval request to the Sustainability Team via MS Forms. 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.) & it's 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 receival of fiber from any Residual Fiber (processing residues & tertiary feedstock) source, the Fiber Team will submit an approval request to the Sustainability Team via MS Forms. 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 & it’s 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 it's 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 Biogeoclimactic 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)

As a paid member of IBAT, the BP has access to spatial data for a wide range of IUCN Red Listed Species, Key Biodiversity Areas, and Protected Areas. 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. 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 consider Key Habitat Attributes at a stand level & landscape level by considering Key Biodiversity Areas as identified by IBAT & old growth forests as areas identified by the province within Old Growth Management Areas (OGMAs) & Old Growth Deferral Areas (OGDAs). All three datasets are available spatially to the BP & will be used in Phase 1 of the Monitoring Forest Feedstock mitigation measure as a spatial review prior to approval of the potential fiber source.

Relating to all ownership types

Key Habitat Attributes
If the harvest unit overlaps with data from the KBA layer, the BP will request documented evidence of management for wildlife & stand retention relating to the forest management of the site.

- If the supplier provides sufficient evidence that mitigates risk, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
  - For Public (Crown) land, this will be in the form of a management plan
  - For Private lands, this will be in the form of questions in the applicable Forest

Feedstock Questionnaire with questions relating to stand retention & WTPs
- If the supplier cannot provide sufficient evidence that mitigates, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the KBA 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 KBA layer will be checked for implementation of the management strategies identified in the evidence provided in 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.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certification Body (CB) conducted a systematic review of the proposed mitigation measure designed to address the specific risk identified under criterion 2.1.3 of the British Columbia Interim Regional Risk Assessment. This process entailed: 1. **Review of Documentation** • Analysis of the measure's design, including objectives, implementation procedures, and alignment with SBP indicator requirements. • Verification of how the measure addresses the identified risk through documented standard operating procedures (SOPs) and corrective action plans. 2. **On-Site Verification** • Field visits and site inspections to confirm the measure has been properly implemented in operational settings. • Interviews with responsible personnel to assess their understanding, training level, and adherence to the measure. • Examination of records (e.g., logs, monitoring results, incident reports) to verify consistent application and effectiveness over time. 3. **Performance Testing and Data Review** • Inspection of quantitative and qualitative data indicators, such as incident frequency, trend analysis, or compliance rates. • Cross-comparison of current performance metrics against baseline conditions to assess improvements attributable to the mitigation measure. **Conclusions of the CB:** • **Adequate Design:** The CB determined that the mitigation measure is well-designed, addressing all critical aspects of the specified risk under criterion 2.1.3. • **Effective Implementation:** Field evidence and documentation confirm consistent application of the measure, with clearly defined responsibilities and procedures. • **Demonstrated Effectiveness:** Data and site observations indicate a measurable reduction—or complete mitigation—of the previously identified risk. • **Recommendation:** The CB concludes that, based on objective evidence and verification, the mitigation measure is **effective**. No additional corrective or adaptive actions are required at this time. • **Ongoing Monitoring:** The CB recommends periodic monitoring during future surveillance audits to ensure continued effectiveness and to promptly identify any emerging issues.

Country
Canada

Area/Sub-Scope
British Columbia - All Sub-Scopes
Indicator
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Specified risk description
Data shows Canada's annual rate of deforestation is low and Canada has contributed a fraction of a per cent to global deforestation since 1990. National data also shows that non-forest industry sectors (i.e., agriculture, built-up, hydro & hydro lines, mines, oil & gas, and transportation) are the economic drivers of deforestation and ultimately land conversion. Although the deforestation rate is low, this Indicator is to evaluate the risk of land conversion, not the rate. On Crown land for licensees with forest management tenures, there is a comprehensive regulatory framework governing reforestation requirements and limited conversion to non-forest use. The Forest Planning and Practices Regulation sets measurable practice requirements. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Results verify compliance with reforestation requirements. On Crown land for the industry sectors that do not have forest management type tenures, legislation does not restrict land conversion. Due to a lack of evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land in British Columbia. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land and other private land in British Columbia.
Detailed description of a mitigation measure
The BC RRA identifies Specified Risk relating to conversion of Forests, Wetlands, Peatlands, & Highly Biodiverse Grasslands to other use types. This indicator will be addressed by Phase 1 & 2 of the Monitoring Forest Feedstock mitigation measure. Relating to Public (Crown) Land On public lands in British Columbia, there are significant levels of legislation relating to the management of water & reforestation of harvested sites. The BC RRA identifies low risk for water quality, including wetlands / peatlands on Public (Crown) land. In Phase 1 of the mitigation measure, the BP will spatially the harvest unit by tenure type 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 & water management of harvested sites. Harvest units that are within a Forest License, Woodlot, or Community Forest are all required by law to manage for these values. 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 forest operations that require reforestation (Forest Licenses, Woodlots, or Community Forests) will be considered low risk by the Sustainability Team & approved - Harvest units that originate from forest operations that do not require reforestation will be rejected by the Sustainability Team Relating to Private Lands The BP will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking: - if the landowner / supplier is reforesting the harvest unit - if the landowner / supplier is pulling stumps from the harvest unit The Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being reforested, the Sustainability Team will approve the potential fiber source - If the site is not being reforested, the Sustainability Team will reject the potential fiber source - If the landowner / supplier is not pulling stumps from the harvest unit, the Sustainability Team will approve the potential fiber source - If the landowner / supplier is pulling stumps from the harvest unit, the Sustainability Team will follow up with the supplier to ask why o If stumps are being pulled from the harvest unit for forest management / health concerns, the Sustainability Team will collect pictures & evidence to support the forest health concern & approve the potential fiber source o If stumps are being pulled from the harvest unit for reasons other than forest management / health concerns, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure As it relates to the management of water, wetlands, and peatlands, see indicator 2.2.5 mitigation measures
Detailed description of CB evaluation of mitigation measure and its conclusions
The mitigation measures were found **effective**: the structured procedures and controls in place effectively mitigate the risk of non-compliant as identified in 2.2.1. The certificate holder's internal monitoring, combined with routine reviews and corrective action tracking, ensures ongoing compliance and continuous improvement.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator

2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
All six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem (2.2.3, 2.2.4, 2.2.5, 2.2.9, 2.2.10, 2.2.11) have low risk designations for Crown land and private managed forest land in British Columbia. As such, this Indicator also has a low risk designation for Crown land and private managed forest land in British Columbia. Four of the six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem, (2.2.3 – Soil Quality Maintained or Enhanced; Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; 2.2.9 – Long-term Production Capacity, and 2.2.10 – Regen After Harvest) have a specified risk designation for other private land in British Columbia. As such, this Indicator also has a specified risk designation for other private land in British Columbia.
Detailed description of a 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).
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
There is a comprehensive regulatory framework governing soil conservation on Crown land. The FPPR sets measurable practice requirements regarding soil disturbance limits, the number of permanent access structures, road deactivation and rehabilitation requirements, and maintenance of natural drainage patterns. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Inspection results verify compliance with practice requirements related to soil quality. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. Audits and inspection reports completed by the MFC verified landowners comply with regulatory requirements for soil disturbance and road construction and maintenance. Based on the evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring

framework and/or results of current condition of soil quality, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia.
Detailed description of a 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
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
There is a comprehensive legislative framework governing water quality and quantity maintenance on Crown land. The FPPR sets measurable practice requirements. There are operational guidelines and government programs monitor forest management practices. Compliance monitoring of water quality and quantity is completed and verifies conformance. FREP data indicates that current forest management practices are effective in maintaining riparian function and water quality on majority of streams. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. On private managed forest land, federal legislation is comprehensive. Requirements for water are legislated in the PMFLA. MFC annual inspection results verify conformance with the water requirements. Based on the evidence reviewed, this

Indicator is designated as low risk for private managed forest land in British Columbia. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of water quality and quantity, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia
Detailed description of a 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
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Specified risk description
There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels and regulating actual harvest volumes. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data. FOR sets long-term sustainable harvest levels. FOR monitors actual harvest levels. FOR reports and databases provide data to verify actual harvest volumes are below the long-term sustainable harvest levels. Based on evidence reviewed, this Indicator is designated

as low risk for Crown land in British Columbia. On private managed forest land, Regulations and an associated reporting and monitoring system is in place. While the long-term sustainable harvest level on private managed forest land is not publicly available, the compliance rate for re- planting harvested and disturbed areas is high. Based on evidence reviewed, this Indicator is designated as low risk on private managed forest land in British Columbia. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of harvest levels, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia. 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.
Detailed description of a 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 monitoring & outcomes relating to indicator 2.2.1 & 2.2.10 for reference to how the BP will mitigate this risk.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
2.2.10 Harvested areas shall be regenerated
Specified risk description
There is a comprehensive regulatory framework governing regeneration on Crown land. Stocking standards, and annual declarations provide evidence that licensees are complying with regeneration legislation. Government programs and independent auditing boards monitoring forest management practices and provide recommendations for improvement. Inspection and audit results verify compliance with practice requirements related to regeneration. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. Audits and inspection reports completed by the MFC verify landowners are complying with reforestation requirements. Based on the evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of regeneration following timber harvesting, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia.

Detailed description of a 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
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Specified risk description
There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data, excluding low-productivity sites. Timber Supply Review examples demonstrate that significant areas of low-productivity sites are removed from the timber harvesting landbase on Crown land in BC. Sites of low productivity are correlated with sites that have renewal challenges. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. On private managed forest land, there are no regulatory or process requirements which remove low productivity sites from harvest eligibility, and no evidence of the management of low productivity

sites. However, MFC monitoring results verifies compliance with regeneration requirements on harvested blocks. Based on evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of timber harvesting from low-productive or difficult to regenerate sites, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia. 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

Detailed description of a mitigation measure

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 receival 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 MS Forms. 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.) & it's 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.

Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - All Sub-Scopes
Indicator
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Specified risk description
The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive (Details provided in Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced). There is no regulatory framework specific to the management of high carbon stocks. A specified risk designation was applied to Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown land, private managed forest land and other private land. Additionally, there is a lack of evidence to support implementation mechanisms, an oversight/monitoring framework, and/or results to verify the identification and the subsequent avoidance of harvesting of primary feedstock from forests that have combined attributes of high carbon stocks and high conservation values on Crown land, private managed forest land and other private land. Given the lack of evidence, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land, private managed forest land and other private land in British Columbia.
Detailed description of a 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 Sustainable Biomass Program's guidance documentation for this indicator, a threshold of the top 10% of carbon stocks can be used as a control measure. To address this, the BP will consider High Carbon Stocks in the province to be equivalent to Old Growth forests. These areas have been defined by the government in Old Growth Management Areas (OGMAs) & Old Growth Deferral Areas (OGDAs) as old / over mature forests with significant levels of above & below ground carbon & other key biodiversity attributes. 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. With the BP implementing its Old Growth policy for avoidance of OGMAs & OGDAs in British Columbia, the BP will consider this risk as mitigated in relation to mitigation measures for indicator 2.1.3.
Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Specified risk description
BC has closely regulated, controlled, and enforced occupational health and safety laws and regulations. It is concluded that appropriate health and safety safeguards are in place for WorkSafeBC registered companies. The majority of companies who harvest on Crown land and private managed forest land are WorkSafeBC registered. As such, are required to follow WorkSafeBC rules. WorkSafeBC conducts audits and site visits to ensure companies are compliant. Based on evidence reviewed, this Indicator is designated as low risk for Crown land and private managed forest land in British Columbia. As other private land in BC is owned by individuals or small businesses, there is no requirement to be WorkSafeBC registered. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results to verify safeguards are in place to protect the health and safety of workers, this Indicator is designated as specified risk for other private land in British Columbia.
Detailed description of a 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
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for

British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - PMFL & Other Private Lands
Indicator
4.2.1 Negative social and community impacts shall be identified and avoided.
Specified risk description
Sustainable forestry practices must take into account the needs and rights of local communities, protect ecosystems and biodiversity, and support local livelihoods and economies. Elements of this Indicator are discussed and assessed in the following Indicators: • Biodiversity, ecosystem productivity and function are described across Criterion 2.1 and 2.2; • Labour rights are described across Criterion 4.1; • Contributions to the local economy are described in Indicator 4.2.2 Positive Contribution to Local Community; • Indigenous, rights, consultation and cultural heritage are described in Indicators 4.2.4 Legal, Customary & Traditional Tenure & Use Rights, 4.2.6 Consultation/Accommodation, and 4.2.7 Designated Cultural Heritage Sites Preserved, respectively; and • Forestry grievances and disputes are described in Indicator 4.2.5 Grievance & Dispute Mechanisms - Forestry. Consultation and requirements and processes specific to Indigenous peoples are discussed in Indicators 4.2.4 Legal, Customary & Traditional Tenure & Use Rights, 4.2.6 Consultation/Accommodation, and 4.2.7 Designated Cultural Heritage Sites Preserved. Grievances and dispute mechanisms related to tenure and use rights and forest management practices are discussed in Indicator 4.2.5 Grievance & Dispute Mechanisms – Forestry. The focus of this Indicator is to ensure that the identification and avoidance of negative social and community impacts are incorporated into forest management planning through a consultation process with stakeholders who may be impacted. Negative impacts to communities may occur if sustainable and responsible forestry practices are not conducted, including loss of tenure and use rights, loss of access to areas with cultural, social, heritage, and economic values used by communities, loss of employment and economic opportunities, health and welfare impacts on communities, and loss of adequate access for recreation. There is a comprehensive legal framework with appropriate controls governing consultation requirement during forest management planning on Crown land. Consultation to identify and avoid negative social and community impacts is required prior to plan approval. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land in British Columbia. Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia
Detailed description of a 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)
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - Other Private Lands
Indicator
4.2.3 Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Specified risk description
There is a regulatory framework and implementation mechanisms for the protection of drinking water on Crown land. CEB Natural Resources Database and Forest Practices Board reports verify compliance with FRPA and FPPR for the protection of human drinking water. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. There is a legislative framework, implementation mechanisms and a monitoring framework in place on private managed forest land. MFC annual reports verify compliance with the protection of human drinking water as per PMFLA requirements. Based on evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia. There are provincial legislative requirements for the protection of human drinking water on other private land. However, there is no publicly available information describing implementation mechanisms, a monitoring framework, and/or results of the current condition for the protection of human drinking water. Due evidence, a precautionary approach is applied, and this Indicator is designated as specified risk for other private land in British Columbia.
Detailed description of a 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).
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for

British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - PMFL & Other Private Lands
Indicator
4.2.4 Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Specified risk description
A legal framework exists in BC to identify, document, and respect traditional tenure and use rights of Indigenous Peoples. The BC government has passed DRIPA, has a Declaration Act Action Plan, and works collaboratively with Indigenous leadership. There are Consultation and Revenue Sharing Agreements that identify consultation processes. There are a range of programs to advance First Nations participation in forestry and forest management. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. Indigenous Peoples have not asserted tenure and use rights on private managed forest land and other private land. As such, this Indicator is designated as specified risk on private managed forest land and other private land in British Columbia.
Detailed description of a 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.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
British Columbia - PMFL & Other Private Lands
Indicator
4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Specified risk description
In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), The BC Declaration of the Rights of Indigenous Peoples Act (DRIPA) and the principles of the Reconciliation Strategy, the Government recognizes the right of Indigenous Peoples to participate in decision-making on matters that affect their rights, through their own representative institutions. It also acknowledges the obligation to consult and cooperate in good faith with the aim of securing their free, prior, and informed consent (FPIC). The importance of FPIC, as outlined in the UN

Declaration, extends beyond titled lands and encompasses broader issues related to Indigenous rights, governance, and stewardship responsibilities. Therefore, this Indicator is designated as Low risk for Crown land in British Columbia. In addition, Indigenous Peoples have not asserted tenure and use rights on private land. As such, this Indicator is also designated as specified risk for private land in British Columbia.
Detailed description of a 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.
Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - All Sub-Scopes
Indicator
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Specified risk description
Biodiversity is a complex issue; it contains elements both at the landscape- level and stand-level, and sufficiency of maintenance or enhancement is difficult to evaluate within a risk assessment process. Indicator 2.1.3 is focused on how effectively threats to key species, habitats, ecosystems and areas of high conservation value are mitigated to maintain or enhance biodiversity values. In most cases, mitigation results from some level of protection or permanence of sustenance. The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive. Legislative requirements, controls and guidance are in place to provide protection and/or allow the implementation of practices that maintain or enhance both landscape-level and stand-level biodiversity values. It should be noted that this risk assessment does not evaluate the sufficiency of the regulatory framework but evaluates its implementation for the elements of biodiversity values that are in place (See Indicator 2.1.1 Context section for details.) The Crown licensees' FMP, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. In evaluating implementation mechanisms there are sections where FMP guidance is to "retain" or "maintain" or "recruit" specific elements without specific targets set in legislation or strategic level guidance. Without legislative direction or government guidance (i.e., target area, percent target or minimum requirements), there is uncertainty about the sufficiency/uniformity of implementation vis-a-vis maintenance and enhancement of biodiversity values across diverse Crown Land timber disposition holders. Government programs provide oversight and monitor regulatory planning and practices for biodiversity values. There is no indication of widespread or systemic legal noncompliance. However, government oversight is focused on legal compliance with legislation for biodiversity values but not on sufficiency relative to the maintenance and enhancement of biodiversity values. This reinforces uncertainty with respect to sufficiency/uniformity of implementation across diverse Crown Land timber disposition holders. The Alberta government and other organizations have, and continue to, assess the maintenance and enhancement of landscape-level and stand- level biodiversity values. There are many assessments and reports covering different spatial and temporal scales. The results of this data, assessments, and reports are wide and varied, making it difficult to provide a definitive conclusion. Based on the extensive results, this risk assessment is unable to draw a sufficiency conclusion on the maintenance or enhancement of specific biodiversity values. This risk assessment does identify areas of uncertainty. In the evaluation of Crown land, the most evident areas of uncertainty for the maintenance of biodiversity values are related the following: • Woodland Caribou habitat due to the incomplete recovery plan development and/or implementation (only 2 of the 11 sub-regional plans

had been completed); • SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion; • Intact Forest Landscapes due to lack of provincial recognition and implementation mechanism; • RTE ecosystems due to no minimum protection targets; and • Old forests do not have government minimum targets and are not spatially permanent. • Incomplete regional land use plans Based on evidence reviewed and applying the precautionary approach, this Indicator is designated as specified risk for Crown land in Alberta. There is an extensive federal and provincial regulatory framework governing biodiversity values. On private land, due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, and a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.

Detailed description of a mitigation measure

Context - Forest Feedstock Deliveries
Prior to receival of fiber from any Forest Feedstock (logs or bush grind) source, the Fiber Team will submit an approval request to the Sustainability Team via MS Forms. 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.) & it's 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 receival of fiber from any Residual Fiber (processing residues & tertiary feedstock) source, the Fiber Team will submit an approval request to the Sustainability Team via MS Forms. 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 & it's proximity to any specified risk areas identified by the BP.

The assessment of this indicator identifies specified risk as it relates to four values of key ecosystems & High Conservation Values, all of which will be addressed by verification of the spatial location of the harvest unit in relation to data available to the BP for each of the values. To address the identified specified risk, the BP will implement a Monitoring Forest Feedstock mitigation measure for Forest Feedstock sources, with an Education & Outreach approach for Residual Fiber sources.

Monitoring Forest Feedstock & Avoidance of High Risk Feedstock:

Landscape Level Species at Risk (Caribou)

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

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

Intact Forest Landscapes

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

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

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

harvest units in Phase 1 of the Monitoring Forest Feedstock mitigation measure. If overlap is present, the BP will request documented evidence of the supplier's analysis of seral stage distribution targets as required by legislation are being met.
- If there is no overlap with the IFL layer, the Sustainability Team will approve the source as low risk;
- If there is overlap with the IFL layer & the supplier provides evidence to show the landscape level objectives are being met, the Sustainability Team will approve the fiber source as low risk;
- If there is overlap with the IFL layer & the supplier cannot provide evidence of this, or targets are not being met after reviewing the evidence, the Sustainability team will reject the harvest unit as a potential fiber source as specified risk is not being mitigated.

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

For IFLs with Specified Risk potential, the BP will include a spatial review of proposed harvest units in Phase 1 of the Monitoring Forest Feedstock mitigation measure. If overlap is present, the BP will request documented evidence of the supplier's analysis of seral stage distribution targets as required by legislation are being met.
- If there is no overlap with the IFL layer, the Sustainability Team will approve the source as low risk; - If there is overlap with the IFL layer & the supplier provides evidence to show the landscape level objectives are being met, the Sustainability Team will approve the fiber source as low risk;
- If there is overlap with the IFL layer & the supplier cannot provide evidence of this, or targets are not being met after reviewing the evidence, the Sustainability team will reject the harvest unit as a potential fiber source as specified risk is not being mitigated.

Local & Endemic Species at Risk & Ecological Communities

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

IBAT is a biodiversity data provider licensing commercial access to global biodiversity datasets and derived data layers including the IUCN Red List of Threatened Species™, the World Database on Protected Areas (WDPA) and the World Database of Key Biodiversity Areas (WDKBA)

As a paid member of IBAT, the BP has access to spatial data for a wide range of IUCN Red Listed Species, Key Biodiversity Areas, and Protected Areas. To mitigate the risk on Local SAR, the BP will cross reference the provincial list of Species at Risk with a Red List label with the data available in the province from IBAT to identify species to focus on for monitoring exercises.

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

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

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

- If the supplier provides sufficient evidence that mitigates risk of impact to referenced species in the applicable Forest Feedstock Questionnaire, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
- If the supplier cannot provide sufficient evidence that mitigates risk of impact to referenced species in the applicable Forest Feedstock Questionnaire, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the Species / Ecological Communities at Risk layer, the site will be considered low risk & the Sustainability Team will approve the potential fiber source

- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites that overlap with the Species at Risk layer will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Key Habitat Attributes & Old Forests

The AB RRA identifies a precautionary evaluation concerning key habitat attributes & old forests in the province. 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 consider Key Habitat Attributes at a stand level & landscape level by considering Key Biodiversity Areas as identified by IBAT & old forests as areas identified by the BP that meet the criteria of 40 years plus the culmination of mean annual increment (CMAI). All three datasets are available spatially to the BP & will be used in Phase 1 of the Monitoring Forest Feedstock mitigation measure as a spatial review prior to approval of the potential fiber source.

Relating to all ownership types

Key Habitat Attributes
If the harvest unit overlaps with data from the KBA layer, the BP will request documented evidence of management for wildlife & stand retention relating to the forest management of the site.
- If the supplier provides sufficient evidence that mitigates risk, the Sustainability Team will consider the harvest site as low risk & approve the potential fiber source
· For Public (Crown) land, this will be in the form of a management plan
· For Private lands, this will be in the form of questions in the applicable Forest Feedstock Questionnaire with questions relating to stand retention & WTPs
- If the supplier cannot provide sufficient evidence that mitigates, the Sustainability Team will consider the site as specified risk & reject the potential fiber source
- If the harvest unit does not overlap with the KBA 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 KBA layer will be checked for implementation of the management strategies identified in the evidence provided in Phase 1 of the mitigation measure

Old Forests
The Alberta government Ministry of Forestry & Parks (MFP) defines old forests as stands 40 years older than the culmination of mean annual increment (CMAI). To spatially identify these areas in the province, the BP will utilize vegetation inventory data in Alberta to create a review layer with areas that meet the following characteristics:
- conifer leading stands with at least 100 years CMAI
- deciduous leading stands with at least 80 years CMAI
Once these areas are identified, the BP will select all polygons within the two selections that have the culmination age of:
- 100 + 40 (140 years) for conifer leading stands

- 80 + 40 (120 years) for deciduous leading stands This new layer will be used as the BP's proxy for old forests in Alberta. 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 Old Forest 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 Old Forest 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.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for British Columbia. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered,

the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - All Sub-Scopes
Indicator
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Specified risk description
Data shows Canada's annual rate of deforestation is low and Canada has contributed a fraction of a per cent to global deforestation since 1990. National data also shows that non-forest industry sectors (i.e., agriculture, built-up, hydro & hydro lines, mines, oil & gas, and transportation) are the economic drivers of deforestation and ultimately land conversion. Although the deforestation rate is low, this Indicator is to evaluate the risk of land conversion, not the rate. On Crown land for licensees with forest management tenures, there is a comprehensive regulatory framework governing reforestation requirements and limited conversion to non-forest use. FOMP data verified timber disposition holders comply with reforestation requirements. On Crown land for the industry sectors that do not have forest management type tenures, legislation does not restrict land conversion. Due to a lack of evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land in Alberta. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.
Detailed description of a mitigation measure
The AB RRA identifies Specified Risk relating to conversion of Forests, Wetlands, Peatlands, & Highly Biodiverse Grasslands to other use types. This indicator will be addressed by Phase 1 & 2 of the Monitoring Forest Feedstock mitigation measure. Relating to Public (Crown) Land On public lands in Alberta, there are significant levels of legislation relating to the management of water & reforestation of harvested sites. The AB RRA identifies low risk for water quality, including wetlands / peatlands on Public (Crown) land & Private Land. In Phase 1 of the mitigation measure, the BP will identify the type of quota or permit for the harvest unit & include questions on reforestation efforts within the Forest Feedstock Questionnaire. - - Harvest units that originate from forest operations that do not require reforestation/ will not be reforested or satisfactorily restocked will be rejected by the Sustainability Team Relating to Private Lands

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 unitThe Sustainability Team will review all submissions of the Forest Feedstock Questionnaire in Phase 1 of the mitigation measure. - If the site is being reforested, the Sustainability Team will approve the potential fiber source - If the site is not being reforested, the Sustainability Team will reject the potential fiber source - If the landowner / supplier is not pulling stumps from the harvest unit, the Sustainability Team will approve the potential fiber source - If the landowner / supplier is pulling stumps from the harvest unit, the Sustainability Team will follow up with the supplier to ask why o If stumps are being pulled from the harvest unit for forest management / health concerns, the Sustainability Team will collect pictures & evidence to support the forest health concern & approve the potential fiber source o If stumps are being pulled from the harvest unit for reasons other than forest management / health concerns, the Sustainability Team will reject the potential fiber source - Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
All six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem (2.2.3, 2.2.4, 2.2.5, 2.2.9, 2.2.10, 2.2.11) have low risk designations for Crown land in Alberta. As such, this Indicator also has a low risk designation for Crown land in Alberta.

Three of the six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem, (2.2.3 – Soil Quality Maintained or Enhanced; 2.2.9 – Long-term Production Capacity and 2.2.10 – Regen After Harvest) have a specified risk designation for private land in Alberta. As such, this Indicator also has a specified risk designation for private land in Alberta
Detailed description of a mitigation measure
See associated mitigation measures for the referenced indicators with specified risk designations (2.2.3 – Soil Quality Maintained or Enhanced; 2.2.9 – Long-term Production Capacity; and 2.2.10 – Regen After Harvest).
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
There is a comprehensive regulatory framework governing soil quality for Crown land. There are well described operational guidelines for harvesting related to soil erosion, compaction, and rutting. The government monitors harvest blocks for compliance. MFP FOMP data verify compliance with practice requirements related to soil quality. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of soil quality, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.
Detailed description of a 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
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Specified risk description
There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels and regulating actual harvest volumes. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data. MFP approves long-term sustainable harvest levels, as well as monitors actual harvest levels. MFP reports and databases provide data to verify actual harvest volumes are below the long-term sustainable harvest levels. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of harvest levels, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.
Detailed description of a 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.
Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
2.2.10 Harvested areas shall be regenerated
Specified risk description
There is a comprehensive regulatory framework governing regeneration on Crown land. Silviculture activities are reported annually and are monitored by MFP. The Annual Reforestation Report in Alberta and FOMP data verified timber disposition holders comply with regeneration requirements. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of regeneration following timber harvesting, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.
Detailed description of a 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
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for

Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Specified risk description
There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data, excluding low-productivity sites. FOMP data verifies compliance with regeneration. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification of low-productive or difficult to regenerate sites as well as the avoidance of timber harvesting from these sites, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in Alberta.
Detailed description of a 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 Alberta Vegetation Inventory (AVI) dataset from the Alberta government to find areas that are in the bottom 10% of site productivity & 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
Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - All Sub-Scopes
Indicator
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Specified risk description
The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive (Details provided in Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced). There is no regulatory framework specific to the management of high carbon stocks. A specified risk designation was applied to Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown land, and private land. Additionally, there is a lack of evidence to support implementation mechanisms, an oversight/monitoring framework, and/or results to verify the identification and the subsequent avoidance of harvesting of primary feedstock from forests that have combined attributes of high carbon stocks and high conservation values on Crown land and private land. Given the lack of evidence, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land and private land in Alberta.
Detailed description of a mitigation measure
The AB RRA identifies Forest Feedstock originating from areas of combined attributes of High Conservation Value & High Carbon Stock as a Specified Risk as it relates to all ownership types. In the Sustainable Biomass Program’s guidance documentation for this indicator, a threshold of the top 10% of carbon stocks can be used as a control measure. To address this, the BP will consider 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. High Conservation Values (HCVs) have been identified in indicator 2.1.3, being Landscape Level SAR (Caribou), Intact Forest Landscapes, Local SAR, & Key Habitat Attributes / Old Forests. The BP will spatially review these datasets in Phase 1 of the Monitoring Forest Feedstock mitigation measure & reject fiber sources that have harvest areas overlapping with wetlands & other HCVs.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for

Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - All Sub-Scopes
Indicator
4.1.8 Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Specified risk description
At the professional level, mandatory requirements are set for academic standards of entry, standards of conduct, continuing competency development, and annual competence assessments. AAFMP's regulatory framework ensures the ongoing training and competence of forest professionals registered to practice in Alberta. At the forest worker level, due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify training for forest workers related to roles and responsibilities, a precautionary approach is applied. As such, this Indicator is designated as specified risk at the provincial level in Alberta. During the consultation period for the Interim AB RRA, SBP received the following comment (Page 210 of the Interim AB RRA) relating to this indicator: "This indicator separates the responsibilities of working professionals from equipment operators & loggers. This should not be separated as the professional forester is responsible for the sign off that harvesting was completed to a required standard. Within the professional responsibility of a forester, ensuring qualified contractors is an element of due diligence. Any work that is done on crown land is monitored by the FOMP branch of the government, this includes the environmental aspect of carrying out forestry activities. Contraventions for trespasses, riparian impacts, & soil degradation are monitored and made publicly available on the Forests Act contraventions website. Fines are levied if the cause is found. Each of these mechanisms are significant influences on the training provided to forest workers, and this should not be considered a specified risk. - The working body should consider excluding elements related to safety within this indicator as they are already addressed in indicator 4.1.10." The response from SBP (Page 210 of the Interim AB RRA) is as follows: "We agree with your comment on indicator 4.1.8. We have deleted the text and the references to safety and security as they are covered in indicator 4.1.10." The change to low risk was not reflected in the released version of the Interim AB RRA. With this comment, the BP is to consider this indicator as low risk for Alberta
Detailed description of a mitigation measure
n/a - SBP has confirmed this indicator should be assessed as low risk through the stakeholder feedback process of the RRA development.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and

have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Specified risk description
Alberta has closely regulated, controlled, and enforced occupational health and safety laws and regulations. It is concluded that appropriate health and safety safeguards are in place for WCB Alberta registered companies. The majority of companies who harvest on Crown land are WCB Alberta registered. As such, are required to follow WCB Alberta rules. MJET conducts audit and site visits to ensure these companies are compliant. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. As private land in Alberta is owned by individuals or small businesses, there is no requirement to be WCB Alberta registered. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results to verify safeguards are in place to protect the health and safety of workers, this Indicator is designated as specified risk for private land in Alberta.
Detailed description of a 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.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review,

stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
4.2.1 Negative social and community impacts shall be identified and avoided.
Specified risk description
Sustainable forestry practices must take into account the needs and rights of local communities, protect ecosystems and biodiversity, and support local livelihoods and economies. Elements of this Indicator are discussed and assessed in the following Indicators: • Biodiversity, ecosystem productivity and function are described across Criterion 2.1 and 2.2; • Labour rights are described across Criterion 4.1; • Contributions to the local economy are described in Indicator 4.2.2 Positive Contribution to Local Community; • Indigenous, rights, consultation and cultural heritage are described in Indicators 4.2.4 Legal, Customary & Traditional Tenure & Use Rights, 4.2.6 Consultation/Accommodation, and 4.2.7 Designated Cultural Heritage Sites Preserved, respectively; and • Forestry grievances and disputes are described in Indicator 4.2.5 Grievance & Dispute Mechanisms - Forestry. Consultation and requirements and processes specific to Indigenous peoples are discussed in Indicators 4.2.4 Legal, Customary & Traditional Tenure & Use Rights, 4.2.6 Consultation/Accommodation, and 4.2.7 Designated Cultural Heritage Sites Preserved. Grievances and dispute mechanisms related to tenure and use rights and forest management practices are discussed in Indicator 4.2.5 Grievance & Dispute Mechanisms – Forestry. The focus of this Indicator is to ensure that the identification and avoidance of negative social and community impacts are incorporated into forest management planning through a consultation process with stakeholders who may be impacted. Negative impacts to communities may occur if sustainable and responsible forestry practices are not conducted, including loss of tenure and use rights, loss of access to areas with cultural, social, heritage, and economic values used by communities, loss of employment and economic opportunities, health and welfare impacts on communities, and loss of adequate access for recreation. There is a comprehensive legal framework with appropriate controls governing consultation requirement during forest management planning on Crown land. Consultation to identify and avoid negative social and community impacts is required prior to plan approval. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in Alberta.
Detailed description of a 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)
Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - All Sub-Scopes
Indicator
4.2.4 Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Specified risk description
In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the principles of the Reconciliation Strategy, the Government recognizes the right of Indigenous Peoples to participate in decision-making on matters that affect their rights, through their own representative institutions. It also acknowledges the obligation to consult and cooperate in good faith with the aim of securing their free, prior, and informed consent (FPIC). The importance of FPIC, as outlined in the UN Declaration, extends beyond titled lands and encompasses broader issues related to Indigenous rights, governance, and stewardship responsibilities. Therefore, this Indicator is designated as specified risk for Crown land in Alberta. In addition, Indigenous Peoples have not asserted tenure and use rights on private land. As such, this Indicator is also designated as specified risk for private land in Alberta.
Detailed description of a mitigation measure
Relating to crown land in Alberta, specified risk was designated because the province does not have the legislative equivalency to DRIPA (which was used as evidence for low risk in British Columbia's RRA) or publicly available reports of consultation. In the absence of this specific legislative piece, the BP has assessed the risk potential of harvest operations on Crown land to be considered not respecting the values of Indicator 4.2.4. The Government of Alberta requires companies to complete a rigid First Nations consultation process for development on Crown land. Part of this consultation is information sharing between the operator & First Nations in the area of planned operations, with the Government of Alberta's regulatory body granting approval that the consultation was adequate prior to operations commencing . This consultation process is applicable to a wide range of developments, including Oil Sands, conventional Oil & Gas, Pipelines, Mining, Forestry, Parklands, Public Infrastructure, & Flood Recovery / Mitigation. The contents of assessment & approval of adequacy of development projects are highly confidential between the First Nation, operator, & regulatory body. Although confidential, the BP can assess there is a low risk for 4.2.4 to be impacted by

forestry operations as harvesting cannot occur on Crown land in the Province of Alberta if adequacy has not been granted. Adequacy approval from the Government of Alberta shows due process for operators on Crown land to have identified, documented, & respected the legal, customary, & traditional tenure / use rights of Indigenous Peoples and local communities.

In addition to the BP's assessment on the approval of forestry operations on Crown land in Alberta, the RRA working group has also assigned there to be low risk relating to Indicator 4.2.6 (Consultation & Accommodation) on Crown land.

The context of this indicator is not applicable to the Private Land sub-scope that had specified risk assigned to it. The following rationale will be used by the BP to justify negligible (low) risk:

For the risk assessment, the RRA working body establishes the following as it relates to Private Land:
- Indicator 1.1.1 (Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations) is low risk
- Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk
- Indicator 1.1.3 (Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements) is low risk
- Indicator 1.1.4 (Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date) is low risk
- Indicator 1.1.5 (There shall be adequate protection of the Supply Base from unauthorized and illegal activities, such as illegal logging, mining, and encroachment) is low risk
- Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk

Within the context of Indicator 4.2.4 (Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected) the RRA working body also establishes that Indigenous Peoples have not asserted tenure and use rights on private land. If there are currently no use rights asserted within the sub-scope, there should not be a risk associated with infringing on use rights relating to private land. In the future, if there were to be use rights asserted on private lands, the RRA working body has established through the following indicators:
- Indicator 1.1.2 (Legal ownership of land and resource use rights shall be respected) is low risk, and
- Indicator 4.2.5 (Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices) is low risk

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

mitigated.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Specified risk description
In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the principles of the Reconciliation Strategy, the Government recognizes the right of Indigenous Peoples to participate in decision-making on matters that affect their rights, through their own representative institutions. It also acknowledges the obligation to consult and cooperate in good faith with the aim of securing their free, prior, and informed consent (FPIC). The importance of FPIC, as outlined in the UN Declaration, extends beyond titled lands and encompasses broader issues related to Indigenous rights, governance, and stewardship responsibilities. Therefore, this Indicator is designated as low risk for Crown land in Alberta. In addition, Indigenous Peoples have not asserted tenure and use rights on private land. As such, this Indicator is also designated as specified risk for private land in Alberta.
Detailed description of a 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 riskWith the pieces of evidence listed above, the BP will consider risk for this indicator to be mitigated.
Detailed description of CB evaluation of mitigation measure and its conclusions
The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.

Country
Canada
Area/Sub-Scope
Alberta - Private Land
Indicator
4.2.7 Designated cultural heritage sites shall be preserved.
Specified risk description
Protection and conservation of designated cultural heritage resources is a legislated requirement, with responsibilities placed on timber disposition holders, private landowners, professional archaeologists, and Ministry of Arts, Culture and Status of Women. A registry of designated cultural

heritage sites is publicly available and is updated. Due to the requirement of confidentially, the registry is not publicly available. There is legislation, implementation mechanisms, and a monitoring framework for the protection of cultural heritage resources on Crown land in Alberta. Qualified cultural resource management consultants are responsible for implementation mechanisms and oversight framework to manage and preserve historic resource values through screening and field verification of potential high value cultural heritage sites on proposed harvesting activities in the AOP. All permit applications and final reports submitted by cultural resource management consultants are reviewed and approved by Ministry of Arts, Culture and Status of Women. Reporting of historic resources sites is mandatory on Crown land. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta. There are provincial legislative requirements for the protection of cultural heritage sites on private land. However, there is no publicly available information describing implementation mechanisms, a monitoring framework, and/or results of the current condition for the protection of cultural heritage sites. Due to a lack of evidence, a precautionary approach is applied, and this Indicator is designated as specified risk for private land in Alberta

Detailed description of a mitigation measure

The specified risk in Alberta was designated as there isn't a publicly available listing for designated heritage sites on private lands. Although this list is not available publicly, landowners in the Province of Alberta are notified by the government if their property is potentially or formally designated as a historic resource. To address this risk, the BP will incorporate questions in the relevant Forest Feedstock Questionnaire to address this indicator, asking:
if the landowner has been notified that their property contains a historic resource feature

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

- If the site is being managed with respect to heritage features or if the landowner has not been informed of any designated heritage resource on their land, the Sustainability Team will approve the potential fiber source
- If the landowner has been notified of the presence of a heritage feature on their property & harvesting is not being managed with respect to heritage features, the Sustainability Team will reject the potential fiber source
- Approved fiber sources will be subject to Phase 2 of the monitoring program & sites will be checked for implementation of the reforestation strategies provided in Phase 1 of the mitigation measure

Detailed description of CB evaluation of mitigation measure and its conclusions

The Certificate Holder (CH) has implemented effective mitigation measures to address the specified risks identified in the SBP interim Regional Risk Assessment (RRA) for Alberta. These measures are aligned with the requirements of the SBP Framework and have been evaluated by the Certification Body (CB) through document review, stakeholder consultation, and field verification. Based on the evidence gathered, the CB concludes that the mitigation actions in place are adequate and proportionate to manage the identified risks and ensure compliance with applicable indicators under the SBP RRA.