



Supply Base Report:

Shaw Renewables - Hardwood Lands Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

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1 Overview

Producer name:	Shaw Renewables - Hardwood Lands
Producer address:	1239 Sandy Desert Road, B0N 1Y0 Hardwoodlands, Canada
SBP Certificate Code:	SBP-04-16
Geographic position:	45.067200, -63.519200
Primary contact:	Julie Griffiths, +1 902 750 0173, jgriffiths@shawrenewables.ca
Company website:	www.shawgrouppltd.com
Date report finalised:	12 Feb 2026
SBR reporting period from:	30 Nov 2024
SBR reporting period to:	31 Oct 2025
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	24 Aug 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document REDII: Bridging requirements of the SBP scheme for meeting REDII. v1.2, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Canada (Eastern QC), Canada (Nova Scotia), Canada (New Brunswick)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Shaw Renewables - Hardwoodlands, Nova Scotia, manufactures and supplies wood pellets primarily to the Atlantic Canada region; some are exported to European markets.

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

Number of employees: 18

Annual maximum production capacity (metric tonnes): 50000

Number of direct feedstock suppliers: 7

Approximate number of feedstock sub-suppliers: 0

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

Processing residues (i.e. sawdust, shavings, chips, bark) supplied by locally sourced sawmills (Nova Scotia and New Brunswick) are the feedstock used in wood pellet production at the plant. The sawmill suppliers source their forest products mostly from Nova Scotia or New Brunswick forests.

Currently, about 50% of processing residues originate from FM-certified forests (SFI). Forest products and residues, such as non-merchantable sawlogs, disaster wood, and biomass, can be sourced to eastern QC, NB, or NS may also be used.

2.2 Detailed description of the Supply Base

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

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

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

Country	Canada
Area/Region	Eastern QC
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority

Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
A Supply Base Evaluation is not required because there is a Regional Risk Assessment available for the region.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	5.0000
Map(s) of the Supply Base area:	
The supply base area includes eastern Quebec (Gaspesie and Bas St. Laurent regions), Canada	

Country	Canada
Area/Region	Nova Scotia
Exclusions	N/A
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
A Supply Base Evaluation is not required for the province of Nova Scotia because a Regional Risk Assessment is available.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No

Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	3.4000
Map(s) of the Supply Base area:	
The supply base area includes the Province of Nova Scotia, Canada.	

Country	Canada
Area/Region	New Brunswick
Exclusions	N/A
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
A Supply Base Evaluation is not required for the province of New Brunswick because a Regional Risk Assessment is available.	
Feedstock types included in SBE:	Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	6.0000
Map(s) of the Supply Base area:	
The supply base area includes the Province of New Brunswick, Canada.	

2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

Picea glauca	White Spruce
Picea rubens	Red Spruce
Picea mariana	Black Spruce
Abies balsamea	Balsam Fir
Tsuga canadensis	Eastern Hemlock
Pinus strobus	White Pine

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority
Explanation: Some of the forest product was pulpwood and some may be taken from a site that underwent a salvage operation.
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 0.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 100.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Other Naturally Regenerated Forest
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0 tonnes
- m. **Volume of processing residues feedstock:** 1-200,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Offcuts, Clean chips or dust
- n. **Share of SBP-recognised system claim for processing residues:**

50.00 % N/A

- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Offcuts, Clean chips or dust
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 200000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 5000000.00 tonnes
Explanation: All feedstock collected annually by the BP will be REDII-compliant sustainable feedstock. 5,000,000mt of REDII-compliant feedstock that could be harvested annually in the supply base. The radius around the BPs plant where sourcing is economically viable is small compared to the availability of fiber throughout the supply base.

3 Supply Base Risk Assessments and Risk Management Measures

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

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

A supply base evaluation was completed to evaluate Prince Edward Island in the event that any material is received from salvage operations in the region. However, during this reporting period, there was no material purchased from PEI as part of a salvage operation.

3.2 Conflicts with applicable national and sub-national legislation

There are no conflicts with national and sub-national legislation.

3.3 Risk Management Measures

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

Country: Canada	
Area/sub-scope: Quebec Private Outside of Program	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.	
Description of the specific risk:	

The Quebec Interim RRA (2025) designates a specified risk to private forests that are outside of the province's silviculture program because without the use of the management assistance programs, there is no effective monitoring system to ensure compliance with regulatory requirements.

Mitigation measure:

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits validate the location of the feedstock by tracing the information back to the location of the stump. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.

The mitigation measure suggested in the Quebec Interim RRA (2025) is to assess and confirm compliance, with credible and corroborated evidence, of forestry operations in private forests without recourse to management assistance programs, based on a justified sampling of field visits.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report will show the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: Quebec Private Outside of Program

Risk Assessment used:

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

Indicator with specified risk:

2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.

Description of the specific risk:
In Quebec private forests, regional plans for the protection and enhancement of private forests (PPMV), in line with MRC management plans, adopt an ecosystem approach with monitoring indicators to aim for the range of natural variation. The responsible authorities ensure public participation and consultation to establish the orientations and objectives of the PPMVs and plans. Either the forestry advisor or the landowner is responsible for identifying VSS habitat and other rare or sensitive ecosystems. Activities carried out without recourse to management assistance programs are therefore not necessarily supervised or documented by forestry professionals. Although, in theory, these activities must comply with management plans, municipal by-laws and other laws and regulations associated with forestry operations in private forests, the lack of public information demonstrating compliance with these requirements means that it is not possible to confirm whether HCVs have been identified and mapped on these properties. In the case of activities in private forests without the use of management assistance programs, a certain risk is posed by the absence of documentation or supervision by forestry professionals (QC Interim RRA, 2025).
Mitigation measure:
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits validate the location of the feedstock by tracing the information back to the location of the stump. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. Suggested mitigation measures in the Quebec Draft RRA include confirming the identification of biodiversity-related HCV habitat in forest prescriptions, verifying VMEs in the CDPNQ database, and field visit reports to validate implementation of management activities appropriate to VME habitats in private forests, as required. These would be carried out as part of the BPs internal wood supply audit program.
Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report fulfills the suggested mitigation measure in the Quebec Interim RRA (2025). The audit report shows the outcomes of this mitigation measure.

Country: Canada
Area/sub-scope: Quebec Private Outside of Program
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed

	☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
In Quebec, although forest management activities must comply with management plans, municipal by-laws and other laws and regulations associated with private forestry operations, the lack of public information demonstrating compliance with these requirements means that it is not possible to confirm whether HCVs have been identified and mapped on these properties. In the case of activities carried out in private forests without recourse to management assistance programs, the work is not necessarily supervised or assessed by forestry professionals. There is therefore a definite risk in private forests without the use of management assistance programs that the threats and impacts on the main species, natural habitats, ecosystems and areas of high conservation value (HCV) relating to biodiversity in the supply area will not be identified and assessed (QC Interim RRA, 2025). Therefore, the QC Draft RRA has designated a low risk for private woodlots outside of the province's silviculture program.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits validate the location of the feedstock by tracing the information back to the location of the stump. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. Suggested mitigation measures in the Quebec Draft RRA include confirming the identification of biodiversity-related HCV habitat in forest prescriptions in private forests without management assistance programs, verifying VMEs in the CDPNQ database, and field visits. These would be carried out as part of the BPs internal wood supply audit program.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report fulfills the suggested mitigation measure in the Quebec Interim RRA (2025). The audit report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: New Brunswick	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
The NB 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 NB Interim RRA (2025) was unable to draw a sufficiency conclusion on the maintenance or enhancement of specific biodiversity values. The RRA 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: 1) SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion; 2) RTE ecosystems are not recognized at the stand level; and 3) Derivation of FMP/license-level old forest targets (NB Interim RRA, 2025). This indicator is designated as specified risk for Crown license in New Brunswick. On industrial private land and private woodlots, due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, it was designated as specified risk for industrial private land and private woodlots in New Brunswick (NB Interim RRA, 2025).	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers	

are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence of the implementation of sound forest management practices to maintain or enhance identified sensitive habitats, species and ecosystems.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: New Brunswick

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

The NB Interim RRAs (2025) report that as of March 2024, there was no publicly available information in New Brunswick describing implementation mechanisms that prevents the conversion of forests for sectors operating on Crown land that do not have forest management type tenures, so a specified risk was designated for New Brunswick.

Mitigation measure:

Each load of forest products, forest residues, and processing residues to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody (CoC). As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock. The BP's DDS verifies that there are no unauthorized activities, such as illegal logging, mining and encroachment. In addition, legislation is in place in QC, NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented.

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: NB Industrial Private and Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

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 industrial private land in New Brunswick. As such, this Indicator also has a specified risk designation for industrial private land in New Brunswick. Two of the six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem, (2.2.3 – Soil Quality Maintained or Enhanced and 2.2.10 – Regen After Harvest) have a specified risk designation for private woodlots in New Brunswick. As such, this Indicator also has a specified risk designation for private woodlots in New Brunswick.

Mitigation measure:

Each load of forest products, forest residues, and processing residues delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody. As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock.

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: NB Industrial Private and Private Woodlots

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim

	☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
There is no regulatory framework for managing or maintaining soil quality on industrial private land and private woodlots in NB, so both have been designated as specified risk in the NB Interim RRA (2025).	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. For this particular indicator, this includes ensuring that soil protection measures are in place for all visited sites of the audit.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim

	☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
As of March 2024, there is no publicly available information describing implementation mechanisms for water quality/quantity maintenance on private woodlots or industrial private land in NS. Therefore, the NS Interim RRA (2025) has designated a specified risk to NS private woodlots and industrial private land.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that sound forest management practices are used to maintain or improve the quality and quantity of groundwater, surface water and downstream water.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

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

	☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.7 Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.	
Description of the specific risk:	
Annual approvals of pesticide application for industrial private land and private woodlots are available on the DECC website. However, as of March 2024, there is no publicly available reporting on pesticide application, monitoring, enforcement or results of current condition of pesticide use for industrial private land and private woodlots in Nova Scotia (NS Interim RRA, 2025).	
Mitigation measure:	
Each supplier must sign a supplier assertion and/or contracts prior to delivery of feedstock at the pellet mill which commits to compliance local, provincial, and federal legislation. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation, in particular a verification of the use of chemical pesticides and verification of evidence of the use of integrated pest management.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

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

	☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.8 Waste shall be disposed of in an environmentally appropriate manner.	
Description of the specific risk:	
On NB private woodlots, the provincial legislation related to the waste management is comprehensive. Due to a lack of evidence to implementation mechanisms and/or results to verify current condition of waste management, a precautionary approach was applied in the NB Interim RRA (2025). As such, this Indicator is designated as specified risk for private woodlots in NB.	
Mitigation measure:	
Each supplier must sign a supplier assertion and/or contracts prior to delivery of feedstock at the pellet mill which commits to compliance local, provincial, and federal legislation. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation, in particular a verification of waste management on audited sites.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

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

	☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.	
Description of the specific risk:	
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.	
Mitigation measure:	
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 on NB industrial private lands, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick (NB Interim RRA, 2025)	
Monitoring and outcomes:	
Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance.	

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

2.2.10 Harvested areas shall be regenerated
Description of the specific risk:
In Quebec private woodlots outside of management assistance programs, there is no public database to validate the regeneration of stands after final felling carried out without recourse to management aid programs. Therefore, the Quebec Interim RRA (2025) has designated a specified risk to this indicator.
Mitigation measure:
Each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill. In the assertion, the supplier declares that roundwood and fiber is not sourced from unacceptable sources (defined in the supplier assertion). On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence of the implementation of sound forest management practices to regenerate sites harvested in forests.
Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

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

Indicator with specified risk:
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Description of the specific risk:
In NB, landowners are responsible for the oversight of harvest operations. As of March 2024, there is no publicly available information describing an oversight framework that confirms timber harvesting avoids low productivity or difficult to regenerate sites on industrial private land or on private woodlots in New Brunswick (NB Interim RRA, 2025). Due to this 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, a specified risk is designated for industrial private land and private woodlots in New Brunswick (NB Interim RRA, 2025).
Mitigation measure:
Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion or contract with the BP. The BP completes annual supplier evaluations for 25% of processing residue suppliers. These audits validate the location of the stump of the feedstock and information provided on the quarterly supplier declarations. Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that primary supply does not come from sites sensitive to nutrient loss harvested in final cut without redistribution of branches and tops within the cutting area.
Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's purchase wood risk assessment, forest practice compliance assessment, and internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada
Area/sub-scope: New Brunswick
Risk Assessment used:

	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
In New Brunswick, as of March 2024, there is no publicly available results to verify that harvesting of primary feedstock is not sourced from forests that have combined attributes of high levels of carbon stocks and high conservation values on Crown license, industrial private land and private woodlots (NB Interim RRA, 2025). The assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced concluded that for biodiversity values specific to high conservation value forests (i.e., key habitat attributes and species at risk, including old forests) are a focal point and that uncertainty as to the maintenance of some biodiversity values was determined, resulting in specified risk for that Indicator on Crown license, industrial private land and private woodlots (NB Interim RRA, 2025).	
Mitigation measure:	
The BP does not source wood fibre from wetlands, peatlands, riparian reserve zones or protected areas. Each load of forest products, forest residues, and processing residues delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. The supplier assertion confirms that roundwood and wood fiber are not sourced from unacceptable sources, which includes: 1) activities that don't comply with local, national, or international legislation on forest management, including environmental protection and protected and endangered species, 2) activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels, and 3) activities where ecologically important forest areas are not identified, protected conserved or set aside. The BP completes annual supplier evaluations for 25% of processing residue suppliers. These audits validate the location of the stump of the feedstock and to validate the information provided on the quarterly supplier declarations and the supplier assertion. Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and	

inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that materials were not sourced from forest areas that have high carbon stocks and high conservation value.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: NB Industrial Private and Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

As of March 2024, there is no public information indicating systematic training for forest workers across the industry in New Brunswick, so this indicator is designated as specified risk at the provincial level in New Brunswick (NB Interim RRA, 2025).

Mitigation measure:

Each load of forest product, forest residue, or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. Supplier assertions or contracts include provisions for compliance to all applicable laws and regulations and declare that the supplier's source area is legally sourced from within NB, NS, PEI, or QC and does not come from controversial sources.

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that training has been provided to workers.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: New Brunswick Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:

4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.

Description of the specific risk:

As private woodlots in NB are 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 Nova Scotia and New Brunswick (NB Interim RRA).

Mitigation measure:

Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. Supplier assertions or contracts that include provisions for compliance to all applicable laws and regulations and declare that the supplier's source area is legally sourced from within NB, NS, PEI, or eastern QC.

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that safeguards are put in place to protect the health and safety of workers by having appropriate policies and procedures.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: NB Industrial Private and Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:
4.2.1 Negative social and community impacts shall be identified and avoided.
Description of the specific risk:
Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land and private woodlots in New Brunswick (NB Interim RRA, 2025).
Mitigation measure:
Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. Supplier assertions or contracts include provisions for compliance to all applicable laws and regulations and declare that the supplier's source area is legally sourced from within NB, NS, PEI, or eastern QC and does not come from controversial sources. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. The BP completes annual supplier evaluations for 25% of secondary and tertiary feedstock suppliers. These audits validate source of the feedstock and information provided on the quarterly supplier declarations and the supplier assertion.
Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

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

	☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.4 Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.	
Description of the specific risk:	
In NB, Mi'kmaq and Wolastoqey Nations land title assertions are in the court system against the Crown and industrial private land owners, and there are on-going lawsuits related to forest management. Due to this, the documentation and respecting of traditional tenure and use rights of First Nations cannot be verified. On November 14, 2024, the New Brunswick Court of King's Bench ruled that Aboriginal title can be declared over privately owned lands. This landmark decision allows the Wolastoqey Nation to pursue their Aboriginal title claim over more than half of New Brunswick, including lands held by major timber and oil companies. Although the court removed the private industrial landowners from the lawsuit, stating that the legal relationship concerning Aboriginal title is primarily between the Crown and the Indigenous group, the ruling implies that the Crown may need to use its expropriation powers to return such lands to the Wolastoqey Nation if reconciliation efforts fail. Based on evidence reviewed, this indicator is designated as specified risk for Crown licenses and industrial private land in New Brunswick.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. Due diligence: keep up-to-date record of ongoing land assertions and progress through the court system. The provincial government handles all negotiations with tenure and use rights of First Nations.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure. Due diligence mitigation demonstrates that the indicator is being monitored.	

Country: Canada	
Area/sub-scope: NB Crown Licence and Industrial Private	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.	
Description of the specific risk:	
Currently in NB, there is no publicly available information on consultation on Annual Operating Plans (AOPs) and Forest Management Plans. Consultation with First Nations on AOPs is starting in the 2024/25 year. Because forestry consultation is not implemented, nor are outcomes known, this indicator is designated as specified risk on Crown licenses. First Nations have asserted Aboriginal title rights on industrial private land, and the matter is before the courts. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition verifying consultation/accommodation are in place, a specified risk designation has been given for industrial private land in New Brunswick.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. Due diligence: keep up-to-date record of ongoing land assertions and progress through the court system. The provincial government handles all negotiations with tenure and use rights of First Nations.	

Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure. Due diligence mitigation demonstrates that the indicator is being monitored.

Country: Canada
Area/sub-scope: Quebec Private Outside of Program
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Description of the specific risk:
The Quebec draft RRA (2025) designates a specified risk to private forests for this indicator because there are no laws or practices associated with biomass harvesting.
Mitigation measure:
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that removal of logging residues or stumps have not caused negative or irreversible impacts on the ecosystem.
Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.3 Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced	
Description of the specific risk:	
There are provincial legislative requirements on industrial private land and private woodlots for the protection of human drinking water. There is no publicly available information on management guidance or monitoring to determine if forest operations negatively impact Protected Water Areas or designated watersheds. There is no publicly available information to indicate compliance with WHWPR, or the Environment Act. Based on the lack of information, this Indicator is designated specified risk for industrial private land and private woodlots in Nova Scotia.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.	
Monitoring and outcomes:	

program report shows the outcomes of this mitigation measure.

Country: Canada	
Area/sub-scope: Quebec Private Outside of program and Public	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
In Quebec, in the absence of documentation on the implementation and monitoring of activities carried out in private woodlots without recourse to management assistance programs, it is impossible to demonstrate that HCVs have been identified and mapped on these properties. In private forests without the use of management assistance programs, there is no documented and easily accessible verification system that confirms the maintenance of key species, natural habitats, ecosystems and HCVs at stand level. Private woodlots outside of management assistance programs are therefore designated as having specified risk (QC Interim RRA, 2025).	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence of the implementation of sound forest management practices to maintain or enhance identified sensitive habitats, species and ecosystems.	

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Additional measures to be considered in the BP's wood supply audit program for Quebec private woodlots outside of the management assistance program, include:

- Ensuring that the woodland caribou habitat is maintained or enhanced and that the planning is consistent with the objectives of the Recovery Strategy.

Ensuring that harvesting doesn't degrade PFIs in the supply region

Country: Canada

Area/sub-scope: Quebec Private Outside of Program

Risk Assessment used:

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

Indicator with specified risk:

2.2.3 Soil quality in the Supply Base shall be maintained or enhanced

Description of the specific risk:

In Quebec, Mapping of sensitive sites is available for both private and public forest. In addition, a guide to sound practices that includes soil protection measures is widely distributed. However activities carried out in private forests without management assistance programs present a specified risk due to the absence of public data and documented monitoring.

Mitigation measure:

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the

previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. For this particular indicator, this includes ensuring that soil protection measures are in place for all visited sites of the audit.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: QC private outside program

Risk Assessment used:

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

Indicator with specified risk:

2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.

Description of the specific risk:

As of March 2024, there is no publicly available information describing implementation mechanisms for water quality/quantity maintenance on private woodlots or industrial private land in NS. Therefore, the NS Draft RRA (2025) has designated a specified risk to NS private woodlots and industrial private land. In QC, in the case of private forests using management assistance programs, silvicultural work is subject to a prescription and execution report signed by a forestry engineer, which is submitted to the regional private forest agency for approval. The execution report includes a verification of the work's compliance with the requirements of the MRNF's technical reference manual for private forests. This report, signed by a forestry engineer, includes basic elements such as bank protection and respect for riparian buffer strips. There is no public database to validate activities carried out in private forests without management assistance programs. Consequently, the risk is specified.

Mitigation measure:
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that sound forest management practices are used to maintain or improve the quality and quantity of groundwater, surface water and downstream water.
Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada
Area/sub-scope: Quebec Private Outside the Program
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Description of the specific risk:
In Quebec, in private forests, in the context of management benefiting from the development assistance program, a forest engineer must write prescriptions and monitor implementation, which considerably reduces the risk of non-compliant practices. In the case of activities in private forests without recourse to management assistance programs, it is impossible to assess compliance with regulatory requirements or

whether activities are adequately addressing this issue in the absence of a documented monitoring system (QC Draft RRA, 2025). Consequently, specified risk is designated to Quebec private woodlots outside of management assistance programs.

Mitigation measure:

Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion or contract with the BP.

The BP completes annual supplier evaluations for 25% of processing residue suppliers. These audits validate the location of the stump of the feedstock and information provided on the quarterly supplier declarations.

Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that primary supply does not come from sites sensitive to nutrient loss harvested in final cut without redistribution of branches and tops within the cutting area.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's purchase wood risk assessment, forest practice compliance assessment, and internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: Quebec Private Forest Outside the Program

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim

	☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Description of the specific risk:	
In private forests Forestry activities in private forests are also monitored by various stakeholders and levels of government. At the municipal level, forestry activities are monitored by inspectors. Since 1995, regional forest development agencies have also been monitoring activities that have benefited from the program. Wood harvested from private forests and marketed in Quebec is subject to the Act respecting the marketing of agricultural, food and fishery products and to regulations governing the marketing of wood by wood producers in each of Quebec's administrative regions. Depending on the region, the unions and boards monitor all or a specific category of wood harvested from private forests. Some unions and boards manage a quota for the marketing of forest biomass in private forests. Since no laws or practices have been associated with biomass harvesting in private forests, the RRA analysis concluded that there is a specified risk for this tenure.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that primary supply does not come from sites sensitive to nutrient loss harvested in final cut without redistribution of branches and tops within the cutting area.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's purchase wood risk assessment, forest practice compliance assessment, and internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: Nova Scotia	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim

	☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
An Independent Evaluation of Implementation of the Forest Practices Report for Nova Scotia (2018) by Lahey in 2021 concluded the NS Endangered Species Act was not fully implemented. In the evaluation of Crown land, the most evident areas of uncertainty for the maintenance of biodiversity values are SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion; and RTE ecosystems are not recognized at the stand level, so it was also designated as specified risk (NS Interim RRA, 2025).	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence of the implementation of sound forest management practices to maintain or enhance identified sensitive habitats, species and ecosystems.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: Nova Scotia	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim

	☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.	
Description of the specific risk:	
The Nova Scotia Interim RRA (2025) report that as of March 2024, there was no publicly available information in Nova Scotia describing implementation mechanisms that prevents the conversion of forests for sectors operating on Crown land that do not have forest management type tenures, so a specified risk was designated for Nova Scotia.	
Mitigation measure:	
Each load of forest products, forest residues, and processing residues to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody (CoC). As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock. The BPs DDS verifies that there are no unauthorized activities, such as illegal logging, mining and encroachment. In addition, legislation is in place in QC, NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
As of March 2024, there are no publicly available results to verify the current condition of soil quality on industrial private land or private woodlots in Nova Scotia, so both have been designated as specified risk in the NS Interim RRA (2025).	
Mitigation measure:	
Each load of forest products, forest residues, and processing residues to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody (CoC). As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock. The BPs DDS verifies that there are no unauthorized activities, such as illegal logging, mining and encroachment. In addition, legislation is in place in QC, NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: NB Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☒ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Description of the specific risk:	
There is no regulatory requirements regarding the removal of harvest residues on industrial private land and private woodlots. As such, this Indicator is designated as specified risk for industrial private land and private woodlots in New Brunswick (NB Interim RRA, 2025).	
Mitigation measure:	
Each load of forest products, forest residues, and processing residues to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody (CoC). As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock. The BPs DDS verifies that there are no unauthorized activities, such as illegal logging, mining and encroachment. In addition, legislation is in place in QC, NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.	
Monitoring and outcomes:	

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Description of the specific risk:	
There is no regulatory requirements regarding the removal of harvest residues on industrial private land and private woodlots. . As such, this Indicator is designated as specified risk for industrial private land and private woodlots in Nova Scotia (NS Interim RRA, 2025).	
Mitigation measure:	
Each load of forest products, forest residues, and processing residues to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody (CoC). As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock. The BPs DDS verifies that there are no unauthorized activities, such as illegal logging, mining and encroachment. In addition, legislation is in place in QC, NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit	

program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: NS Industrial Private and Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:

2.2.8 Waste shall be disposed of in an environmentally appropriate manner.

Description of the specific risk:

In NS private woodlots, the Nova Forest Alliance under the Forest Nova Scotia developed a best management practices manual (2012) for its members including the Federation of Nova Scotia Woodlot Owners. The manual provides detailed guidance on forest harvesting, fuel, and oil handling and performance monitoring. On private woodlots, the owner is responsible to remain compliant with provincial regulatory waste requirements. As of March 2024, there is no publicly available information describing implementation mechanisms for waste disposal on private and industrial private lands, so they have been designated as specified risk (NS Interim RRA, 2025).

Mitigation measure:

Each supplier must sign a supplier assertion and/or contracts prior to delivery of feedstock at the pellet mill which commits to compliance local, provincial, and federal legislation. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit

program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation, in particular a verification of waste management on audited sites.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: New Brunswick

Risk Assessment used:

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

Indicator with specified risk:

2.2.10 Harvested areas shall be regenerated

Description of the specific risk:

Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of regeneration following timber harvesting, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land in New Brunswick (NB Interim RRA, 2025). There is evidence that regeneration activities are completed on private woodlots that participate in the Private Woodlots Silviculture Program, however, the level of participation is not being applied consistently across private woodlots in NB. Most private woodlot areas harvested are naturally regenerated, and there is no systematic survey of regeneration that would attest to the adequacy of stocking. Due to a lack of results, this Indicator has been designated as specified risk for private woodlots in New Brunswick (NB Interim RRA, 2025).

Mitigation measure:

Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill. In the assertion, the supplier declares that roundwood and fiber is not sourced from unacceptable sources (defined in the supplier assertion). On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence of the implementation of sound forest management practices to regenerate sites harvested in forests.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: Nova Scotia Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:

2.2.10 Harvested areas shall be regenerated

Description of the specific risk:

There is evidence that regeneration activities are completed on private woodlots that participate in the Private Woodlots Silviculture Program, however, the level of participation is not being applied consistently across private woodlots. Most private woodlot areas harvested are naturally regenerated, and there is no systematic survey of regeneration that would attest to the adequacy of stocking. Due to a lack of results, a precautionary approach is applied and this Indicator has been designated as specified risk for private woodlots (NS Interim RRA, 2025).

Mitigation measure:

Each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill. In the assertion, the supplier declares that roundwood and fiber is not sourced from unacceptable sources (defined in the supplier assertion).

On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence of the implementation of sound forest management practices to regenerate sites harvested in forests.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: NS Industrial Private and Private Woodlots

Risk Assessment used:

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

Indicator with specified risk:
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Description of the specific risk:
In Nova Scotia, there is no regulatory framework to prevent harvesting sites with low productivity or difficult to regenerate on industrial private land or on private woodlots; furthermore, as of March 2024, there is no publicly available information describing implementation mechanisms that restricts timber harvesting from low productivity or difficult to regenerate sites on industrial private land or private woodlots in Nova Scotia (NS Interim RRA, 2025). A specified risk has been designated to NS industrial private land and private woodlots.
Mitigation measure:
Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion or contract with the BP. The BP completes annual supplier evaluations for 25% of processing residue suppliers. These audits validate the location of the stump of the feedstock and information provided on the quarterly supplier declarations. Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that primary supply does not come from sites sensitive to nutrient loss harvested in final cut without redistribution of branches and tops within the cutting area.
Monitoring and outcomes:
The mitigation measures are an effective means to confirm compliance. The BP's purchase wood risk assessment, forest practice compliance assessment, and internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada
Area/sub-scope: Nova Scotia
Risk Assessment used:

	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
In Nova Scotia, as of March 2024, there is no publicly available results to verify that harvesting of primary feedstock is not sourced from forests that have combined attributes of high levels of carbon stocks and high conservation values on Crown license, industrial private land and private woodlots (NS Interim RRA, 2025). The assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced concluded that for biodiversity values specific to high conservation value forests (i.e., key habitat attributes and species at risk, including old forests) are a focal point and that uncertainty as to the maintenance of some biodiversity values was determined, resulting in specified risk for that Indicator on Crown license, industrial private land and private woodlots (NS Interim RRA, 2025).	
Mitigation measure:	
The BP does not source wood fibre from wetlands, peatlands, riparian reserve zones or protected areas. Each load of forest products, forest residues, and processing residues delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. The supplier assertion confirms that roundwood and wood fiber are not sourced from unacceptable sources, which includes: 1) activities that don't comply with local, national, or international legislation on forest management, including environmental protection and protected and endangered species, 2) activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels, and 3) activities where ecologically important forest areas are not identified, protected conserved or set aside. The BP completes annual supplier evaluations for 25% of processing residue suppliers. These audits validate the location of the stump of the feedstock and to validate the information provided on the quarterly supplier declarations and the supplier assertion. Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and	

inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that materials were not sourced from forest areas that have high carbon stocks and high conservation value.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: Nova Scotia

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

At the professional level in NS, mandatory requirements are set for standards of conduct, continuing forestry education development, and annual competence assessments. RPFAN's regulatory framework ensures the ongoing training and competence of forest professionals registered to practice in NS. 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 Nova Scotia (NS Interim RRA, 2025).

Mitigation measure:

The BP does not source wood fibre from wetlands, peatlands, riparian reserve zones or protected areas. Each load of forest products, forest residues, and processing residues delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. The supplier assertion confirms that roundwood and wood fiber are not sourced from unacceptable sources, which includes: 1) activities that don't comply with local, national, or international legislation on forest management, including environmental protection and protected and endangered species, 2) activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels, and 3) activities where ecologically important forest areas are not identified, protected conserved or set aside.

The BP completes annual supplier evaluations for 25% of processing residue suppliers. These audits validate the location of the stump of the feedstock and to validate the information provided on the quarterly supplier declarations and the supplier assertion.

Suppliers are initially evaluated through a purchase wood risk assessment. Industrial private land in New Brunswick that don't have 3rd party SFM certification would fall into a category requiring a forest practice compliance assessment which would evaluate this indicator. In addition, each supplier must sign a supplier assertion prior to delivery of feedstock at the pellet mill which commits to legal compliance. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter.

These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that materials were not sourced from forest areas that have high carbon stocks and high conservation value.

Monitoring and outcomes:

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

Country: Canada

Area/sub-scope: Nova Scotia Private Woodlots

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed

	☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	
Description of the specific risk:	
As private woodlots in NS are 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 Nova Scotia and New Brunswick (NS Interim RRA).	
Mitigation measure:	
Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. Supplier assertions or contracts that include provisions for compliance to all applicable laws and regulations and declare that the supplier's source area is legally sourced from within NB, NS, PEI, or eastern QC. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that safeguards are put in place to protect the health and safety of workers by having appropriate policies and procedures.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim

	☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.1 Negative social and community impacts shall be identified and avoided.	
Description of the specific risk:	
Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for industrial private land and private woodlots in Nova Scotia (NS Interim RRA, 2025).	
Mitigation measure:	
Each load of forest product, forest residue or processing residue delivered to the mill must be accompanied by a scale slip or waybill identifying the supplier. All suppliers must have a signed supplier assertion with the BP. Supplier assertions or contracts that include provisions for compliance to all applicable laws and regulations and declare that the supplier's source area is legally sourced from within NB, NS, PEI, or eastern QC. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. This includes obtaining evidence that safeguards are put in place to protect the health and safety of workers by having appropriate policies and procedures.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.	

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.	
Description of the specific risk:	
In NS, due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition verifying consultation/accommodation with the Mi'kmaq are in place, a specified risk is designated for industrial private land and private woodlots in Nova Scotia.	
Mitigation measure:	
On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation. Due diligence: keep up-to-date record of ongoing land assertions and progress through the court system. The provincial government handles all negotiations with tenure and use rights of First Nations.	
Monitoring and outcomes:	
The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure. Due diligence mitigation demonstrates that the indicator is being monitored.	

Country: Canada	
Area/sub-scope: NS Industrial Private and Private Woodlots	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☒ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Two of the six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem, (2.2.3 – Soil Quality Maintained or Enhanced and 2.2.5 Water Quality/Quantity Maintained) have a specified risk designation for industrial private land and private woodlots in Nova Scotia. As such, this Indicator also has a specified risk designation for industrial private land and private woodlots in Nova Scotia (NS Interim RRA, 2025).	
Mitigation measure:	
Each load of forest products, forest residues, and processing residues to the mill must be accompanied by a scale slip or waybill identifying the supplier, the product and the tonnage. The BP is 3rd party certified to the PEFC Chain of Custody (CoC). As part of the BP's PEFC chain of custody, a due diligence system (DDS) is in place for all feedstock. The BPs DDS verifies that there are no unauthorized activities, such as illegal logging, mining and encroachment. In addition, legislation is in place in QC, NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented. On an annual basis, a selection of forest product sources are subject to the BP's internal wood supply audit program and inspections are carried out by a registered professional forester. New wood suppliers are added to the wood supply audit program if they have delivered at least 500 MT of forest products for the previous quarter. These audits: 1) validate the location of the feedstock by tracing the information back to the location of the stump, 2) assess indicators designated as specified risk to ensure compliance with the standard, and 3) report on non-compliances and provide corrective actions. The internal wood supply audit program includes site visits in the identified supply base area to validate the conclusions of this Supply Base Evaluation.	
Monitoring and outcomes:	

The mitigation measures are an effective means to confirm compliance. The BP's internal wood supply audit program report shows the outcomes of this mitigation measure.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 05 Mar 2025

Biomass Producer's stakeholder engagement end date: 06 Apr 2025

Total number of stakeholders contacted: 66

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

As part of the stakeholder engagement process, the Supply Base Report was emailed to stakeholders on March 5, 2025. Stakeholders were given 30 days to respond and provide comments (until April 5, 2025). Stakeholders included those with economic, social, or environmental interests, local communities and indigenous peoples' representatives, including NGOs, forest workers associations, labour/trade unions, and so on. There was only one comment from the stakeholder engagement which did not require any further updates to the Supply Base Report or evaluation.

4.2 Response to stakeholder comments

Stakeholder description: Provincial Government

Stakeholder comment: General agreement with the risk evaluation and how it fit with the regional risk assessment

Response to the stakeholder: An email response noted the appreciation for taking the time to review the documentation in detail as it applied to that stakeholder.

5 Report updates and approval

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

This report has been updated to the most recent reporting period.

Name	Julie Griffiths
Title	Management representative
Date of report approval	12 Feb 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

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

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Eastern Québec, the RED III Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1), developed under the Sustainable Biomass Program (SBP) framework, specifies that Québec is classified as Level B for this indicator for private forest land not enrolled in recognized forest management programs. Currently, there are no sources for the Shaw Renewables – Hardwoodlands mill that are sourced from private land not enrolled in forest management programs. Where primary feedstock is sourced from private land classified as Level B, Shaw Renewables implements a site-level management system consisting of annual internal field audits conducted by a qualified forestry professional. These field audits are conducted on a risk-based selection of woodlots and verify that harvesting practices protect soil quality and biodiversity, avoid harvesting of stumps and roots, exclude primary and old-growth forests, prevent conversion of natural forest to plantations, apply appropriate retention of deadwood and habitat features, and use harvesting systems that minimise impacts on soils and biodiversity. Non-conformities are documented and corrective actions are implemented and tracked. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore harvesting practices are outside the scope of site-level verification. The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-QC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have</i>	

developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Eastern Québec, the RED III Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1), developed under the Sustainable Biomass Program (SBP) framework, specifies that Québec is classified as Level B for this indicator for private forest land not enrolled in recognized forest management programs. Currently, there are no sources for the Shaw Renewables – Hardwoodlands mill that are sourced from private land not enrolled in forest management programs. Where primary feedstock is sourced from Public forest classified as Level B, Shaw Renewables applies a site-level management system to ensure that forest biomass does not originate from primary forest or old-growth forest, or from lands with protected or high-biodiversity status as defined under Article 29(3), (4) and (5) of RED III. This is verified through internal auditing process conducted by the biomass producer and a qualified forestry professional, including review of harvest locations, stand characteristics and applicable land-use or conservation designations. Harvest areas identified as primary forest, old-growth forest or protected areas are excluded from supply. Any non-conformities are documented and corrective actions are implemented and tracked. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is further supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. ***The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator. ** **

(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Eastern QC, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that the province of Quebec is **Level B for (vii) indicator for Public and Private lands.** Currently, there are no sources for the Shaw Renewables - Hardwoodlands' mill that are sourced from Quebec private or Public land. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is

	outside the scope of site-level verification. Compliance is further supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. ***The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator. ***
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-QC-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-CA-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i>	

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

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

LULUCF criteria 29(7)

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

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

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Nova Scotia, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that the province of Nova Scotia is Level B for (iv) indicator for industrial private land and private woodlots. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from Nova Scotia industrial private land or private woodlots. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Nova Scotia, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that the province of Nova Scotia is Level B for (v) indicator for industrial private land and private woodlots. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from Nova Scotia industrial private land or private woodlots. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not</i>	

the land continues to have that status:

(a) **primary forest** and other wooded land and **old growth forest**, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Nova Scotia, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that the province of Nova Scotia is Level B for (vi) indicator for Crown, industrial private land, and private forests. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from Nova Scotia Crown, industrial private land or private woodlots. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees.** **The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.** **

(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For Nova Scotia, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that the province of Nova Scotia is Level B for (vi)² indicator for Crown, industrial private lands, and private forests. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from Nova Scotia Crown, industrial private land or private woodlots. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees.** **The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed

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

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

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

Countries where EU RED Supply Base Evaluation is used	
Country	Canada

Area	New Brunswick
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For New Brunswick, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that private woodlots in the province of New Brunswick are Level B for (ii) Forest regeneration of harvested areas. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from New Brunswick private woodlots. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids	

harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For New Brunswick, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that private woodlots in the Province of New Brunswick are Level B for (iv). Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from New Brunswick private woodlots. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.

(v) That harvesting maintains or improves the long-term production capacity of the forest.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For New Brunswick, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that private woodlots in the Province of New Brunswick are Level B for (v). Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from New Brunswick. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system

	for this indicator.
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For New Brunswick, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that private woodlots in the Province of New Brunswick are Level B for (vi)¹ indicator for Crown, industrial private land, and private woodlots. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from New Brunswick. Secondary feedstock is controlled through Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees.* **The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.** **
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For New Brunswick, the REDIII Level A Risk Assessment for Canada Forest (SBP-RED-CA-CA_FOR v1.1) specifies that private woodlots in the Province of New Brunswick are Level B for (vi)² indicator for Crown, industrial private land, and private woodlots. Currently, there are no forest products sourced by Shaw Renewables - Hardwoodlands' mill that are from New Brunswick. Secondary feedstock is controlled through Programme for the Endorsement of Forest

	Certification (PEFC) Chain of Custody and therefore verification of land status and harvesting location is addressed upstream and is outside the scope of site-level verification. Compliance is supported by a signed supplier assertion confirming that fibre is not sourced from unacceptable sources, including ecologically important forest areas, illegal or non-compliant activities, conflict timber or genetically modified trees. ** **The biomass producer's desk-based land status checks for all sourcing areas, combined with risk-based field audits and signed supplier commitments, form the management system for this indicator.** **
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-CA-NB-FOR_v1.1 REDIII Level A for Canada FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land</i>	

with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).

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

LULUCF criteria 29(7)

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

area	
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Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

Processing residue and post-consumer feedstock suppliers are initially evaluated to determine the type of feedstock to be supplied. Depending on the supplier, this may or may not involve going to the site to evaluate the material. Processing residues or post-consumer feedstock that comes to the pellet mill are always accompanied with a scale slip or waybill that identifies the category of the feedstock, the name of the supplier, and the tonnage.

The biomass producer's employees inspect each load and signoff that it is correct as to the category of feedstock that it has been identified and that there are no visible contaminants. Incoming documents are reviewed for accuracy by office management. The sustainability team maintains a supplier list. The supplier list includes the name of the supplier, the categories of feedstock that they supply, and the tonnage received. The BP's annual Supplier Evaluation will include reviewing compliance of its suppliers with SBP definitions and purchase specifications. The BP does not purchase materials that are non-eligible input for SBP products. If suppliers are to provide materials that are non-eligible, they may be temporarily or permanently be suspended from delivering materials.

Feedstock inspection and classification upon receipt

Upon receipt, all processing residues and post-consumer feedstock are subject to visual inspection and shall be classified into secondary and tertiary feedstock. For all processing residues and post-consumer feedstock received, the BP retains the incoming documents as evidence that the feedstock complies with SBP definitions.

Supplier audit for processing residues and post-consumer feedstock

No audits were required in relation to REDII. If the information on incoming documents is incorrect, the BP will include that supplier in the supplier audit program. Immediate action will be taken for any incorrect information on incoming documentation with regards to classification of feedstock or incorrect tonnage. Suppliers may be temporarily or permanently suspended from delivering loads to the plant if they repeatedly provide incorrect information on their waybills or scale slips. Should this occur, it will be recorded and communicated to the CB during the annual third party audit.

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

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

Not Applicable (RED II TOF not included)

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

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