



Supply Base Report:

Groupe Lebel, Inc. 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:	Groupe Lebel, Inc.
Producer address:	313 Bd Industriel, G0L 1G0 Cacouna, Canada
SBP Certificate Code:	SBP-04-73
Geographic position:	47.924475, -69.494465
Primary contact:	Pierre-Olivier Morency, +1 418 554 1101, pierre-olivier.morency@groupelebel.com
Company website:	
Date report finalised:	27 May 2026
SBR reporting period from:	01 Apr 2025
SBR reporting period to:	31 Mar 2026
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	11 Sep 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
Feedstock origin (countries)	Canada (Quebec (Southeastern region)), Canada (New Brunswick), United States (Northeast region (mostly Maine))
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

Groupe Lebel Inc is a pellet producer located in Cacouna, Quebec. The pellet are produced from both primary and processing residue feedstock which is mainly be supplied from Groupe Lebel sisters companies. The pellets are shipped from the Port of Gros Cacouna to the customer.

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

Number of employees: 25

Annual maximum production capacity (metric tonnes): 105000

Number of direct feedstock suppliers: 15

Approximate number of feedstock sub-suppliers: 2

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

All material is subject to the organization's COC procedures for sourcing certified and non-certified material. The organization sources material from certified sources under its valid COC certificate(s) per FSC as well as the Supply Base Evaluation (SBE). The volume credit method is used to control SBP claims. Non-certified material is verified through FSC Controlles wood standard certification. All feedstock is SBP-compliant feedstock.

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.

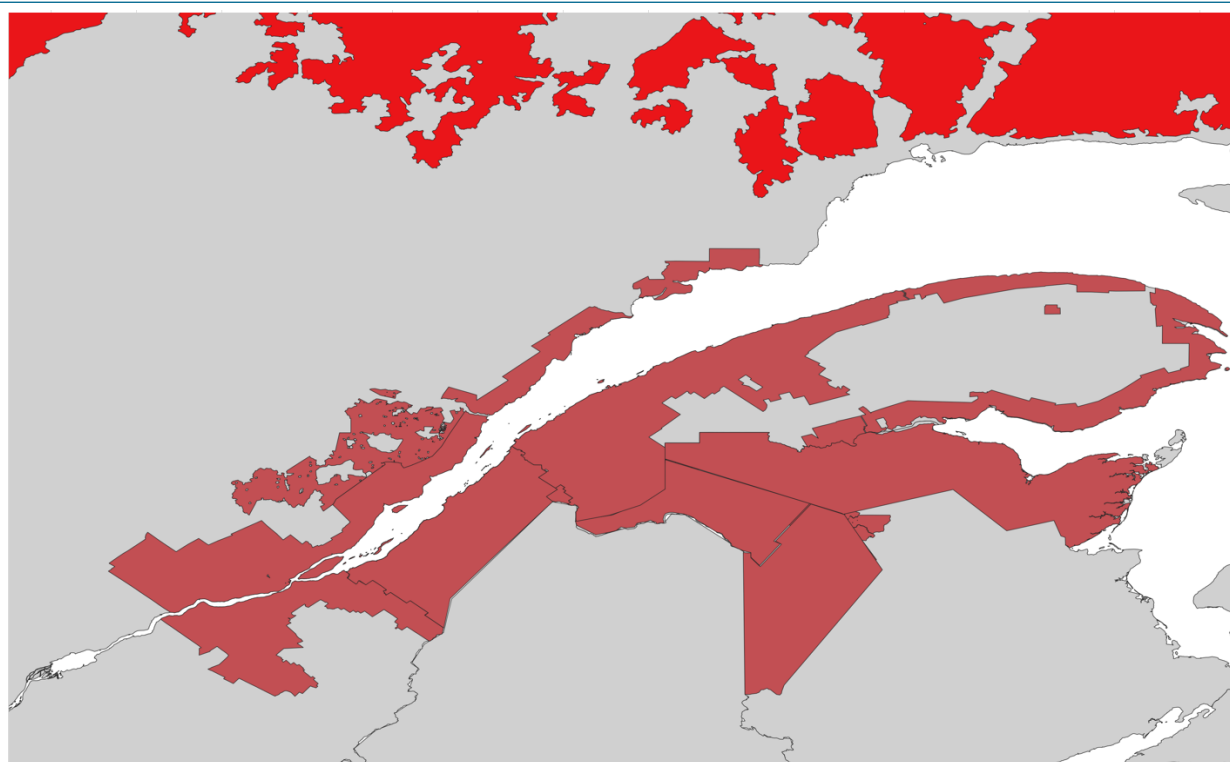
Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Canada
Area/Region	Quebec (Southeastern region)
Exclusions	N/A
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	

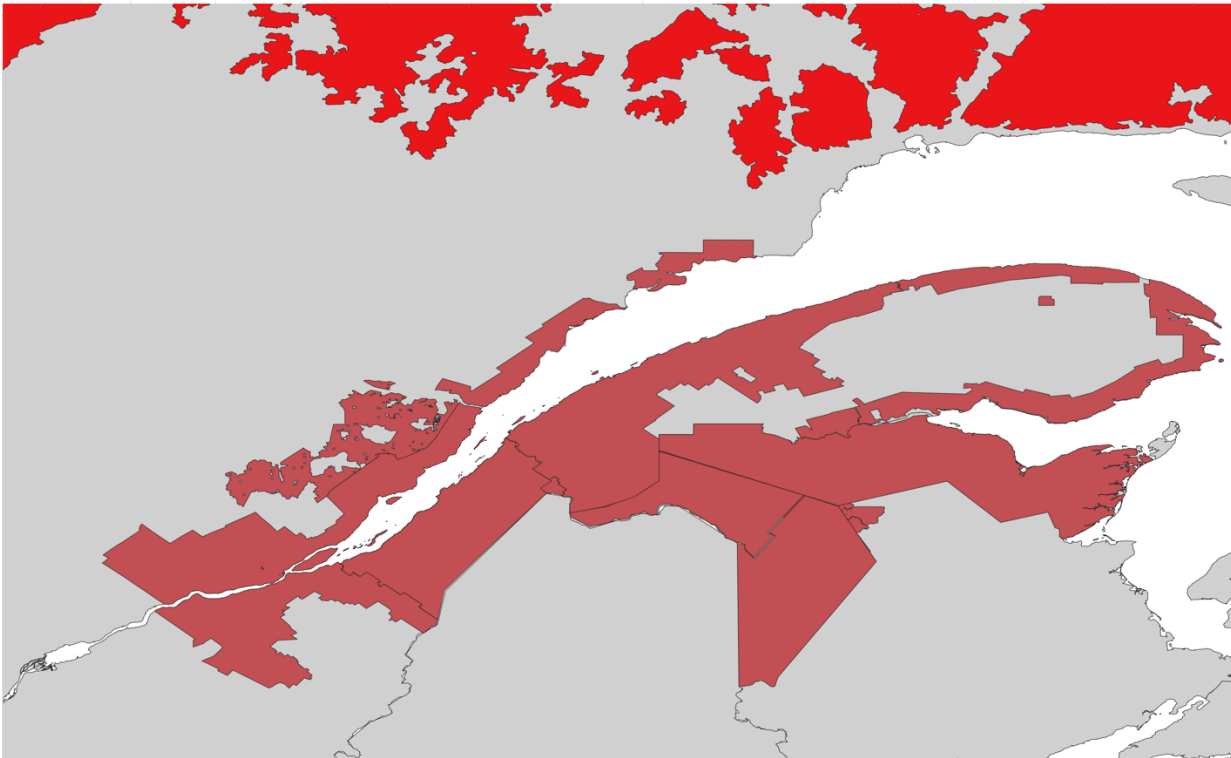
A supply base evaluation (SBE) was conducted to cover the supply base area for all feedstock categories, including primary and processing residues. SBP RRA for the regions of Québec and Nw Brunswick were used as part of the SBE process.

Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	63.8000

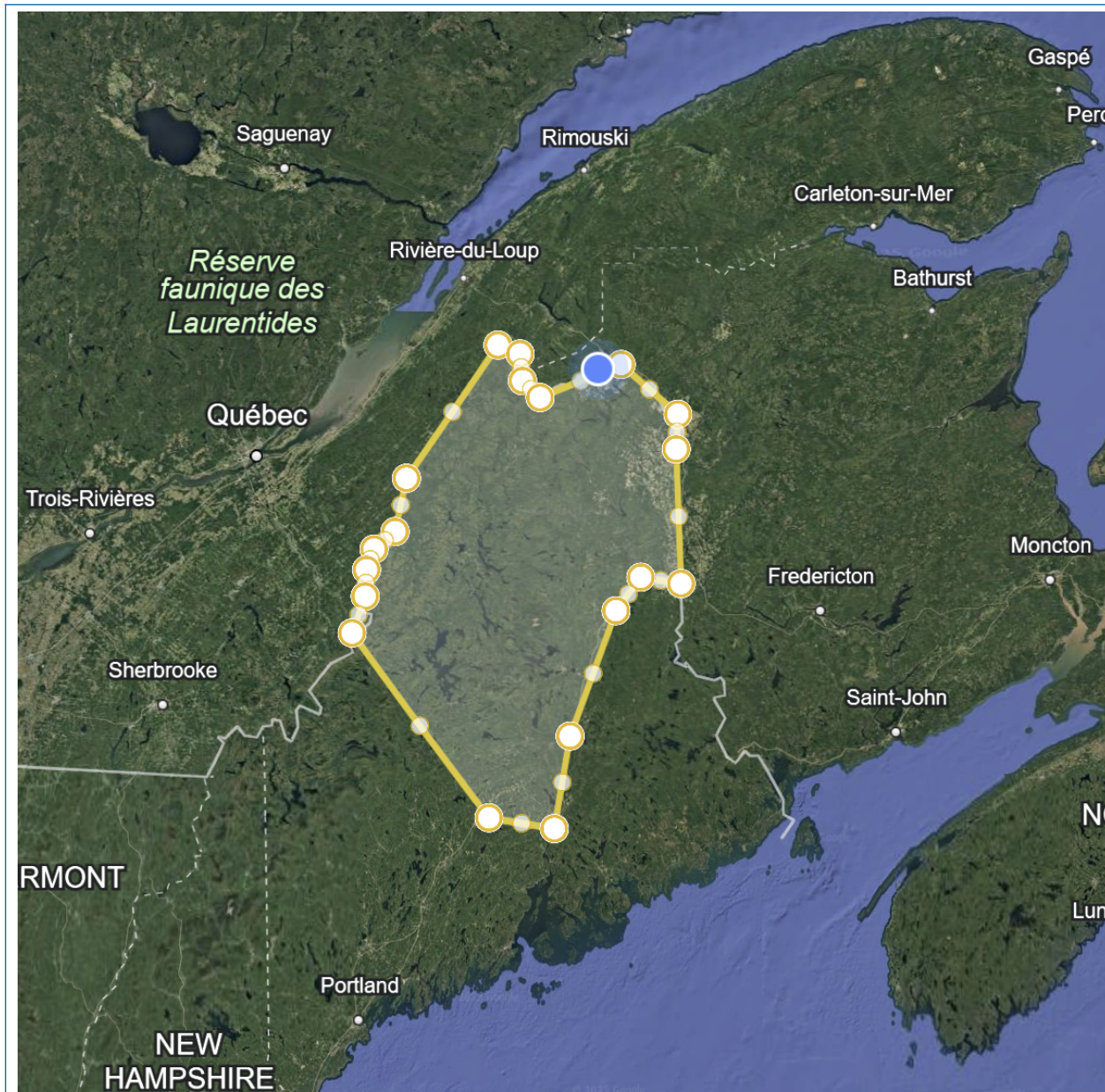
Map(s) of the Supply Base area:



Country	Canada
Area/Region	New Brunswick
Exclusions	N/A
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock

Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
A supply base evaluation (SBE) was conducted to cover the supply base area for all feedstock categories, including primary and processing residues. SBP RRA for the regions of Québec and Nw Brunswick were used as part of the SBE process.	
Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	63.8000
Map(s) of the Supply Base area:	
	

Country	United States
Area/Region	Northeast region (mostly Maine)
Exclusions	N/A
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
A supply base evaluation was conducted to cover the supply base area for all feedstock categories, including primary and processing residues.	
Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	63.8000
Map(s) of the Supply Base area:	



2.3 Feedstock information

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

Abies balsamea	Balsam fir
Picea mariana	Black spruce
Picea glauca	White spruce
Picea rubens	Red spruce
Larix laricina	Tamarack larch
Pinus banksiana	Jack 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?** No
Explanation: N/A
- 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 (%):** 57.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Other Naturally Regenerated Forest
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0
- m. **Volume of processing residues feedstock:** 1-200,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Clean chips or dust
- n. **Share of SBP-recognised system claim for processing residues:**
- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Clean chips or dust
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 60000000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 60000000.00 tonnes
Explanation: All feedstock is EU RED compliant. There are no areas that are not EU RED compliant within the supply base area.

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 conducted to cover the supply base area for all feedstock categories, including primary and processing residues.

3.2 Conflicts with applicable national and sub-national legislation

None identified.

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	
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:	

Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Mitigation measure:
Field assessments on private forests without the use of management assistance programs, to ensure compliance with regulatory requirements.
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada
Area/sub-scope: Quebec
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:
Key species, habitats, ecosystems and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Mitigation measure:
Confirm the identification of biodiversity-related HCV habitat in forest management plans or prescriptions for private forests without recourse to management assistance programs. Verify the presence of threatened or vulnerable species in the in the Centre de Données sur le patrimoine naturel du Québec (CDPNQ) database in the private forest(s). https://www.quebec.ca/gouvernement/gouvernement-ouvert/transparence-performance/indicateurs-statistiques/donnees-especes-situation-precaire Field visit reports to validate the presence and implementation of management activities appropriate to threatened or vulnerable species habitats in private forests.

Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	
Country: Canada	
Area/sub-scope: Quebec	
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:	
Threats to 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.	
Mitigation measure:	
Confirm the identification of biodiversity-related HCV habitat in forest management plans or prescriptions for private forests without recourse to management assistance programs. Verify the presence of threatened or vulnerable species in the in the Centre de Données sur le patrimoine naturel du Québec (CDPNQ) database in the private forest(s). https://www.quebec.ca/gouvernement/gouvernement-ouvert/transparence-performance/indicateurs-statistiques/donnees-especes-situation-precaire Field visit reports to validate the presence and implementation of management activities appropriate to threatened or vulnerable species habitats in private forests.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: Quebec	
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:	
Key species, habitats, ecosystems and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Mitigation measure:	
For public forests, risk is identified relating to Intact Forest Landscapes (IFL) as identified by Global Forest Watch. For public forests, risk is also identified among woodland caribou ranges, given the absence of management criteria and strategies in line with the Government of Canada's modified woodland caribou recovery strategy. Mitigation measure will consist of ensuring that purchased fibre from public forests does not come from identified IFL as well as identified caribou ranges, as identified by Environment and Climate Change Canada (ECCC). For private forests without management assistance programs, field assessments shall be conducted to confirm the maintenance of key species, natural habitats, ecosystems and HCVs at the stand level.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: United States

Area/sub-scope: NE region	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
Soil quality in the supply base shall be maintained or enhanced.	
Mitigation measure:	
Site inspections shall be conducted on a sample basis.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

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

	☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
Soil quality in the Supply Base shall be maintained or enhanced.	
Mitigation measure:	
Fields assessment to verify that measures have been implemented to ensure soil protection in private forests without recourse to management assistance programs.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: United States	
Area/sub-scope: NE Region	
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:	
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.	
Mitigation measure:	
Information on applicable SBP certification requirements shall be provided to suppliers as relevant.	

Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada	
Area/sub-scope: Quebec	
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:	
Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Mitigation measure:	
No procurement of harvest residues and/or stumps. No further verification required.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: Quebec	
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:	
Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Mitigation measure:	
OR Obtain evidence demonstrating the implementation of sound forest management practices to maintain or improve the quality and quantity of groundwater, surface water and downstream water in private forests without recourse to management assistance programs	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: Quebec	
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:	
Harvest areas shall be regenerated.	
Mitigation measure:	
Field assessments to obtain evidence of the implementation of sound forest management practices to regenerate sites harvested in private forests without recourse to management assistance programs.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: Quebec	
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:	
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.	
Mitigation measure:	
Field assessments to confirm that the 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 in private forests without recourse to management assistance program.
No procurement of tops and branches.
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada
Area/sub-scope: NB
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:
Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Mitigation measure:
Field assessments validating key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity are maintained or enhanced.
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada	
Area/sub-scope: NB	
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:	
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. Forest; b. Wetland; c. Peatlands; d. Highly biodiverse grasslands.	
Mitigation measure:	
Crown Licenses: Ensure the existence of a forest management plan, including plans for reforestation. Industrial Private: Ensure the existence of a forest management plan, including plans for reforestation. Private woodlots: Ensure the existence of a forest management plan, including plans for reforestation.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: NB	
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:	
Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Mitigation measure:	
Fields assessment to verify that ecosystems, their health, vitality, functions and services in the Supply Base are maintained or enhanced on Industrial Private and/or Private Woodlots.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

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

Description of the specific risk:
Soil quality in the Supply Base shall be maintained or enhanced.
Mitigation measure:
Fields assessment to verify that measures have been implemented to ensure soil protection in Industrial Private and/or Private Woodlots.
Monitoring and outcomes:
Fields assessment to verify that measures have been implemented to ensure soil protection in Industrial Private and/or Private Woodlots.

Country: Canada
Area/sub-scope: NB
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:
Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Mitigation measure:
Industrial Private - Validate approval process for biomass (woods chipping) to ensure compliance. N/A for Private Woodlots - No procurement of harvest residues and/or stumps. No further verification required.
Monitoring and outcomes:

Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada	
Area/sub-scope: NB	
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:	
Waste shall be disposed of in an environmentally appropriate manner.	
Mitigation measure:	
Fields assessment to verify that waste is disposed of in an environmentally appropriate manner on Industrial Private and/or Private Woodlots.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: NB	
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:	
Harvest levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.	
Mitigation measure:	
Industrial Private: Verification of SFI and/or FSC audit reports for the occurrence of non-conformances related to harvest levels.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: NB	
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:
Harvest areas shall be regenerated.
Mitigation measure:
Field assessments to obtain evidence of the implementation of sound forest management practices to regenerate sites harvested on Industrial Private or Private Woodlots.
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada
Area/sub-scope: NB
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:
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.
Mitigation measure:
Field assessments to confirm that the 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 in Industrial Private or Private Woodlots.

Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada
Area/sub-scope: NB
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:
Primary 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).
Mitigation measure:
Field assessments to confirm that primary feedstock is not sourced from forest areas which are classified as having combined attributes of high carbon stocks and high conservation values (according to local definitions or norms).
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada
Area/sub-scope: NB

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:	
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.	
Mitigation measure:	
Field assessments. Verification if the wood producer are trained as SFI Qualified Logging Professional, as defined by the Atlantic Canada SFI implementation committee.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: NB	
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:	
Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	
Mitigation measure:	
Field assessments. Ensuring safeguards are put in place to protect the health and safety of workers through the development, communication and implementation of policies and procedures.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

Country: Canada	
Area/sub-scope: NB	
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:	
Negative social and community impacts shall be identified and avoided.	

Mitigation measure:
Field assessments. Verification for evidence of identification and avoidance of negative social and community impacts.
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada
Area/sub-scope: NB
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:
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.
Mitigation measure:
A dispute resolution process is established specifically to address issues arising from violations of the right of Indigenous Peoples related to forest management activities.
Monitoring and outcomes:
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.

Country: Canada

Area/sub-scope: NB	
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:	
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.	
Mitigation measure:	
A dispute resolution process is established specifically to address issues arising from violations of the right of Indigenous Peoples related to forest management activities.	
Monitoring and outcomes:	
Monitoring of field assessment reports by the procurement staff and conclusions ensuring low risk.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date:

Biomass Producer's stakeholder engagement end date:

Total number of stakeholders contacted:

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

4.2 Response to stakeholder comments

5 Report updates and approval

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

No changes to the procurement area.

Name	Daniel Martin, ing.f.
Title	Consultant
Date of report approval	27 May 2026

Name	Pierre-Olivier Morency
Title	Management representative
Date of report approval	27 May 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

United States Northeast region (mostly Maine)	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	NA
Risk Rating justification	Findings show the USFS possess a well-defined framework that ensures laws and regulations cover socio-economic and environmental forest management requirements beyond those defined by SBP standards, and are monitored and enforced on NFs. Incidents and violations are recorded. There is a low risk feedstock sourcing on NFs is not in compliance with all existing and applicable laws and regulations.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk legal that ownership and resource use rights are not respected. The USFS has adequate systems and resources in place to ensure the identification of ownership, boundaries and resource use rights. Ownership and resource use rights are confirmed during the project design phases prior to the award of timber sale contracts.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that payments related to timber and forest biomass sales are incomplete and not up to date. The USFS has adequate systems and resources in place to ensure payments associated with timber sold from

	NFs are received in accordance with contract requirements.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that payments related to timber and forest biomass sales are incomplete and not up to date. The USFS has adequate systems and resources in place to ensure payments associated with timber sales from NFs are received in accordance with contract requirements.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk of timber theft or trespass on NFs. The USFS provides adequate protections against illegal activities, and enforcement of applicable laws and regulations on NFs. The USFS implements a structured and integrated approach to forest protection from illegal activities that includes specialized law enforcement personnel from the USFS, cooperation with law enforcement functions at other agencies, and utilizes the eyes and ears of all USFS field staff.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	NA
Risk Rating justification	The USFS has robust systems and capabilities for conducting integrated and cooperative inventories for identifying, quantifying and characterizing current conditions and projected trends for all key species, habitats, ecosystems and

	biological HCVs. Several laws and regulations including the 2012 USFS Planning Rule, NEPA, NFMA, and ESA require the USFS to identify and conserve at-risk species and habitats, and to engage the public in developing plans prior to implementing activities that may impact those species and habitats. USFS employees are further guided by agency directives in the form of its own Manuals and Handbooks providing detailed work instructions for protection of these resources and complying with applicable laws and regulations. Coordination and consultation with other agencies and organizations is fundamental to USFS efforts to identify these resources. Public consultation, including consultation with tribes, during all stages of planning provides additional opportunities for identification of important and sensitive biodiversity resources. USFS staff interviewed during the assessment process described means of implementation and provided documented examples of LRMPs, EAs, reports, and correspondence with the US FWS that demonstrate identification of key species, habitats, ecosystems and biological HCVs. Although some NF LRMPs have not been revised in over 10-years, consistent implementation of comprehensive, multi-disciplinary planning and environmental assessment at the project level provides reasonable assurance that key species, habitats, ecosystems and biological HCVs are identified in advance of implementing any management activities that could affect those species and communities. Amendments to the LRMP can be referred to until a major revision is undertaken. Responsibilities and lines of authority are clearly established, ensuring that appropriate review and approval occurs before project implementation. Well-established processes for public notification and appeal provide added measures of assurance that laws, regulations, and best practices are employed.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	NA
Risk Rating justification	The USFS has a robust suite of complimentary and overlapping processes for identifying and evaluating potential impacts to key species, habitats, ecosystems and HCVs. Consequently, there is a low risk that potential threats and impacts to the environment are not identified and evaluated prior to implementing management activities. Several laws and regulations including the 2012 USFS Planning Rule, NEPA, NFMA, and ESA require the USFS to identify and conserve at-risk species and habitats, and to engage the public in developing plans prior to implementing activities that may impact those species and habitats. USFS

	employees are further guided by agency directives in the form of Manuals and Handbooks that provide detailed work instructions for protection of these resources and complying with applicable laws and regulations. Coordination and consultation with other agencies and organizations is fundamental to USFS efforts to identify these resources. Public consultation, including consultation with tribes, during all stages of planning provides additional opportunities for identification of important and sensitive biodiversity resources.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	NA
Risk Rating justification	The USFS has robust systems for identifying, protecting or restoring ecologically important attributes, including at-risk and sensitive species, critical habitats, and key ecosystems. Several laws and regulations including the 2012 USFS Planning Rule, NEPA, NFMA, and ESA require the USFS to identify and conserve at-risk species and habitats, and to engage the public in developing plans prior to implementing activities that may impact those species and habitats. USFS employees are further guided by agency directives in the form of Manuals and Handbooks that provide detailed work instructions for protection of these resources and complying with applicable laws and regulations. Coordination and consultation with other agencies and organizations is fundamental to USFS efforts to identify these resources. The USFS uses special land designations to ensure key species, habitats, ecosystems, and other areas of high conservation value pertaining to biodiversity are protected in perpetuity. As an example, a combined 70% of the land base in the three NFs sampled for this Indicator (Shoshone, Modoc, Mississippi) have designated as unsuitable for timber production, including 28% having been formally withdrawn and protected from timber harvest as a result of congressional or administrative decree (e.g. Wilderness Area, Roadless Area). The FSC US NRA found that almost all IFLs existing outside areas with permanent legal protect are found in Inventoried Roadless Areas on NFs. Inventoried Roadless Areas are administratively protected from timber harvest, with narrowly defined exceptions. Consequently, the FSC US NRA concluded there is a low risk of sourcing timber from forests where HCV2 are threatened by management activities. The proposed USFS Old-Growth Amendment would revise all NF LRMPs where old-growth exists for the purposes of conserving existing old-growth, as well as recruitment and stewardship of new old-growth forests in the NFS. The proposed Amendment represents a cohesive national approach to

	prioritizing the conservation and stewardship of old-growth forests nationwide, while allowing for adaptive management in response to climate change and other environmental pressures. Management objectives and goals included in LRMPs and NEPA documents demonstrate that timber harvesting is not the primary management objective on NFs. A significant portion of the NFS is dedicated primarily to conservation of key species, habitats and ecosystems. By law, all activities taking place on NFs must be aligned with approved LRMPs. Protective measures, referred to as integrated design features, are informed by specialists' reports and NEPA processes for protection of key species, habitats, ecosystems, and areas supporting high conservation values for biodiversity. Each NF develops a monitoring and evaluation strategy as part of the LRMP to ensure objectives are met and remain relevant and appropriate for achieving the agency mission. Several examples of site, forest level and regional level monitoring reports were provided by USFS staff. All timber sales on lands administered by the USFS are transacted through formal contracts with specific provisions for protection of sensitive areas and special management sites. Timber sale site inspections are regularly conducted by USFS staff to monitor and enforce compliance with contract terms and provisions, including design features and protective measures for maintaining or enhancing key biodiversity values and to see they are appropriately implemented. Responsibilities and lines of authority are clearly established, ensuring appropriate project implementation. Well-established processes for public notification and appeal provide added measures of assurance that laws, regulations and best practices are employed.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	NA
Risk Rating justification	The USFS is legally obligated by numerous federal laws that prohibit degradation of forests, wetlands, grasslands and other native ecosystems. It is legally required to identify areas under their management that are not appropriate for timber production, including lands that are not defined as forest lands. All LRMPs and significant management activities such as timber harvesting are subjected to formal and comprehensive environmental review as required of NEPA. Timber harvests for the purpose of timber production are prohibited from taking place on lands not suitable for timber production. Tree harvests can potentially take place on lands designated as not suitable for timber production for restoration or other specific objectives, however

	timber harvesting is prohibited if soil, slope, or other watershed conditions would be irreversibly damaged. There is no evidence of substantial conversion of wetlands, peatlands or naturally diverse grasslands to other uses on NFs. As stated above and reported via the USFS FACTS database, among the nine NFs sampled for this RRA, the total forest conversion to development (i.e., permanent land clearing) since 2008 represents approximately 0.01% of these NFs. A similar number is reported for all CONUS NFs. This estimate is corroborated by the LCMS which estimated 11,224 acres of forest conversion to developed land use since 2008. Land use changes from forest to development (e.g. permanent land clearing) can be reliably detected using remote sensing techniques. The LCMS is not, however, considered an accurate source of information for forests converted to other land uses due to technical limitations of spectral analysis. In conclusion, USFS staff interviewed during the RRA process consistently stated that – with rare exception - the USFS does not convert forests to other non-forest uses. This assertion is supported by LRMPs, NEPA documents, USFS Manuals and Handbooks, and other directives. Federal laws and regulations applicable to NFs significantly limit and in some instances explicitly prohibit conversion of forests to non-forest uses. Data from three different sources (FIA, LCMS, USFS FACTS database) substantiate that forest loss through permanent land development is exceedingly rare on NFs (i.e., 0.01%). The analysis produced specifically for this RRA using FIA data estimated a very low annual rate (0.017%) for conversion of forest to other non-forest uses. There is a low risk that feedstock sourced on NFs could originate from lands designated as forests, wetlands, peatlands or highly diverse native grasslands in 2008, but have since undergone conversion to other uses.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk ecosystems, their health, vitality, functions and services in NFs are not maintained or enhanced by the USFS operations. LRMPs are required to maintain or restore the ecological integrity of all terrestrial ecosystems, and therefore forest degradation and conversion to other uses is not consistent with USFS mandates. The USFS is legally obligated by numerous federal laws such as NFMA that prohibit degradation of native ecosystems. All LRMPs and significant management activities such as timber harvesting are subjected to formal and comprehensive environmental review as required

	of NEPA. NEPA requires all federal agencies, including the USFS, to identify issues and resources that could potentially be impacted by proposed activities, to assess those impacts, and to develop alternatives that minimize direct, indirect and cumulative impacts that can occur as a result of proposed activities. Further, LRMPs are required to maintain or restore the ecological integrity of all terrestrial ecosystems, and therefore forest degradation and conversion to other uses is not consistent with USFS mandates. These requirements are stipulated in the NFMA, the 2012 USFS Planning Rule (36 CFR Part 219, section 219.11) and FSH 1909.12 Chapter 60 - Forest Vegetation Resource Management. All projects and activities occurring in NFs are consistent with the approved LRMP as required by law (36 CR 219.15) and confirmed via NEPA processes involving interdisciplinary teams of resource management specialists. Timber production is secondary to primary objectives, which aim to improve and restore environmental attributes of the area affected by the project. USFS staff interviewed during the assessment process described means of implementation and provided documented examples of methods used to identify and manage native ecosystems. LRMPs, project-level NEPA documents, regional initiatives, monitoring reports, specialist reports, and other related documents and protocols provide reasonable assurance that measures to maintain and enhance the health, vitality and function of native ecosystems are consistently implemented across the NFS. Responsibilities and lines of authority are clearly established, ensuring that appropriate review and approval occurs before project implementation. Well-established processes for public notification and appeal provide added measures of assurance that laws, regulations and best practices are employed.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	NA
Risk Rating justification	The USFS utilizes several systems and tools to ensure timber harvests are carried out in a manner consistent with the protection of soil and other critical resources that can occur only when soil is not irreversibly damaged. Tools used by the USFS to ensure soil quality is maintained or restored include soil disturbance rapid assessments, the TEUI System, FIA soil quality data, NEPA assessments, and a structured timber sale preparation and execution process.
Risk Rating	Low Risk

United States Northeast region (mostly	Indicator
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Maine)	
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that removal of harvest forest residues and/or stumps will lead to irreversible negative impacts to the ecosystem. The USFS is legally obligated by numerous federal laws that prohibit degradation of native ecosystems. NEPA requires all federal agencies, including the USFS, to identify issues and resources that could potentially be impacted by proposed activities, to assess those impacts, and to develop alternatives that minimize direct, indirect, and cumulative impacts that can occur as a result of proposed activities. Further, LRMPs are required to maintain or restore the ecological integrity of all terrestrial ecosystems, inclusive of soils and habitats. All LRMPs for NFs sampled for Indicator 2.2.4 address soil quality and include standards and guidelines for treatment of forest residuals. Stumps are typically removed only in association with construction of roads and log landings. None of the NFs sampled allow harvesting of stumps. Timber sale contracts include standard and special provisions addressing retention and disposal of forest residuals. These contracts are actively enforced through regular on-site inspections conducted by USFS staff.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that quality and quantity of ground water, surface water and water downstream are not maintained or enhanced. The USFS in collaboration with other federal and state agencies define, plan and monitor activities to ensure the protection, maintenance and restoration of aquatic ecosystems, watersheds and water resources on NFs. Evaluations are conducted at local, state, regional and national levels. NFs must implement their Monitoring Programs in accordance with their LRMPs. Several public databases and websites provide access to documentation about water resources, management goals and monitoring results. Timber sale contract administration through regular site inspections ensures adherence to contract provisions requiring protection of water quality, surface water and ground water.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that air emissions do not comply with national legislation, or in the absence of national legislation, with industry best practices. NFs have well established and comprehensive procedures for ensuring burns do not violate state and federal air quality standards. LRMP direction includes compliance with the Clean Air Act and state air quality standards and state implementation plans for air quality. NEPA requires that potential impacts to air quality are identified, evaluated and if necessary mitigated for all project level activities. LRMP monitoring provide information on current status and trends of air quality. Contract provisions address prevention of air pollution. Timber sale operations are regularly inspected to ensure compliance with contract provisions. Management activities on NFs most likely to impact air quality are prescribed burns. Monitoring indicates that burns do not typically result in significant, long-term impacts to air quality, and do not violate air quality laws.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	Several federal laws including NEPA, FIFRA, and RCRA govern pesticide use on lands administered by the USFS. US Code Title 7, Chapter 6 is a comprehensive statute establishing legal requirements for a broad range of issues relating to pesticide use. The USFS is subject to all of these laws and has developed detailed work instructions in the form of Handbooks and Manuals to guide employees in ensuring compliance with all applicable laws and regulations. NEPA applies to the use of pesticides and requires the USFS to evaluate potential effects of pesticide use and to consider alternative approaches to minimize negative impacts. The use of IPM is widely promoted within the USDA and USFS. The USFS uses pesticides within an IPM framework, and staff consistently demonstrate awareness of IPM. Pesticide use and waste disposal is regulated by multiple laws and regulations and addressed in USFS timber sale contracts. Compliance with contract specifications is

	regularly evaluated and recorded via on-site inspections. Examples of pesticide use records, PUPs, Biological Assessments, and accomplishment reports confirm that laws and best practices are followed. Interviews with USFS staff confirm appropriate knowledge and familiarity with applicable state and federal requirements regarding pesticide use. Additionally, the USFS Pesticide Impact Assessment Program conducts studies to further develop use and effects data for “priority forestry pesticides” to support NEPA assessments of pesticide use in forestry applications and to supplement the data used for the US EPA pesticide registration process.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that waste is not appropriately disposed of on NFs. Several federal laws including NEPA, CWA, and Solid Waste Disposal Act govern the disposal of waste on lands managed by the USFS in an environmentally appropriate manner. USFS Manuals and BMPs explicitly address management of solid waste, hazardous wastes, sanitation systems and other potential sources of waste generated directly or indirectly by USFS activities. Interviews with NF and RO staff reflect a strong level of familiarity with USFS protocols regarding waste disposal. Illegal disposal of waste at impromptu roadside dump sites as well as littering at campgrounds are the most common problems with waste disposal and appear to occur at a reasonably low level on many or most NFs. Incidences of waste disposal problems on logging sites are reportedly atypical and infrequent. One incident was reported on 18 LEI national weekly reports reviewed during the RRA assessment. The USFS operates a Law Enforcement and Investigations program, and additionally trains field staff as Forest Protection Officers. On each NF, there are numerous employees traversing the forest on a daily basis, with LEO's focused primarily on enforcement of laws and regulations. LEI reports reviewed during the assessment indicate LEOs are actively monitoring forest activities and enforcing applicable laws.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.

Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that harvesting levels on NFs are not justified and are not sustainable with reference to inventory and growth data. Each NF is required to calculate a sustained yield limit (SYL) of timber that can be harvested annually in perpetuity. Excluding natural disasters such as fires, FIA data provides the means to demonstrate the state of timber volume on each NF and at broader (e.g., regional, national) scales.⁴ The latest FIA data indicates that at a national level, NFS lands grow significantly more volume than is harvested or lost to mortality, unless caused by catastrophic natural disturbances. Harvest levels in time and space are specified in LRMPs through decisions made in compliance with NEPA. Project-level harvests must follow LRMP direction in time and space or the LRMP must be amended (in compliance with NEPA). The USFS is mandated by the MUSYA, the NFMA, and the 2012 USFS Planning Rule to ensure that 10-year harvest volumes on NFs remain within levels that can be sustained in perpetuity in consideration of multiple use objectives and desired future conditions. Departures from established allowable harvest limits are permitted to the extent they are consistent with management plan objectives. Interviews with staff, annual ASQ records provided, and monitoring reports indicate that NFs typically operate below the level calculated as sustainable in perpetuity. Timber sale contracts outline requirements regarding timber volume reporting, LRMP objectives, and mechanisms for approval prior to any modifications to the plan.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	NA
Risk Rating justification	The USFS provides for the regeneration of forests as required by law and as explicitly referenced in FSM 2400 Timber Management following timber harvest. Evidence shows implementation of the USFS Handbook and Manuals as well as access to monitoring results. Therefore, there is a low risk that sites will not be regenerated after harvests. The NFMA, which builds on requirements set for in the RPA, directs the USFS to maintain “appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management.” The USFS is further directed to monitor reforestation areas after one year and three years to confirm they have been returned to adequate stocking, and if not, to schedule them for retreatment. Sufficient funds to meet regeneration needs must be collected from timber purchasers in compliance with K-V Act.

Risk Rating	Low Risk
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United States Northeast region (mostly Maine)	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk of impacts from natural processes that are not managed on NFs. Legislation, federal inter-agency collaboration, monitoring and assessments are concrete examples of how awareness, consideration, and management of forests to address the potential impacts of natural processes is part of the day-to-day operations of the USFS.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that GMO trees are used on NFs. There are no known references and documentation on GMO use on NFs.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	All states in the Northeast region are determined to maintaining or enhancing their carbon stocks, as per SBP's assessment.
Risk Rating justification	Specified risk. US renounced on the Paris Agreement.

Risk Rating	Specified Risk
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United States Northeast region (mostly Maine)	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	NA
Risk Rating justification	National forest carbon assessments demonstrate that NFs in the lower 48 states function cumulatively as a net carbon sink, and that net flux of forest carbon stocks is positive. Timber harvesting is not a significant driver in loss of forest carbon. In the most recent national assessment, taken as a whole CONUS NFs had a net gain of 39.5 MMT CO₂e in forest carbon stocks in 2021. NFs with net positive changes in carbon stocks comply with Option A of this Indicator. However, forest carbon flux varies considerably between NFs due to forest-level environmental and climatic conditions. Some NFs are currently functioning as sources of GHG emissions largely because of catastrophic natural disturbances. Carbon stocks in NFs in the Western US are decreasing in the long-term as a direct result of climate change and associated increases in frequency and severity of natural disturbances, particularly wildfire and insect infestations. Ample evidence exists to demonstrate that NFs with net negative changes in forest carbon stocks comply with Option B. Although these NFs exhibit net negative carbon flux, the decline is directly attributable to natural processes, and timber harvesting is designed to salvage dead and damaged timber, and/or to assist in regeneration, including improved resiliency to natural disturbances and climate change for existing forests. In other CONUS regions, carbon stocks are experiencing increases, although at a decreasing rate in most USFS Regions. Therefore, NFs experiencing net positive growth in carbon stocks are conformant with Option A of the Indicator. Numerous laws, regulations, policies, and directives establish legal obligations for the USFS to implement management strategies and activities to maintain and enhance forest carbon stocks, and reduce threats to forest carbon stocks by increasing resilience to natural disturbances such as wildfire, and insect infestations. The USFS has several safeguards in place to ensure that harvesting activities do not diminish the capacity of NFs to store carbon. These include designation of forest areas unsuitable for timber production, calculation of SYL levels and allowable sale quantities for 10-year periods, standards and guidelines included in NF LRMPs, NEPA processes associated with proposed projects, site specific controls incorporated into timber sale contracts, and structured contract administration protocols

	including regular site inspections. Salvage operations are not required to be included in SYL and ASQ/PTSQ calculations, although some NFs elect to include estimates for salvage timber harvest volumes. 10-year ASQ has been exceeded by some NFs as a result of extensive salvage operations associated with large scale natural disturbances such as insect infestations, wildfire, and severe wind events. Salvage operations are conducted with the primary objectives of preventing further damage to residual and surrounding forests, and recovering damaged timber. None of the nine NFs selected for the RRA sample set exceeded their 10-year ASQ or SYL. Departures from SYL have reportedly never occurred in the USFS, and are required to go through rigorous analysis, review and approval processes to ensure higher harvest schedules are necessary to achieve NF objectives, comply with all applicable laws, and do not damage long-term forest health and productivity. The risk of sourcing feedstock from NFs that have exceeded their calculated 10-year ASQ is very low, and there is virtually no risk of sourcing from forests their long-term sustained yield limit. Therefore, the risk of sourcing feedstock from areas that are not consistent with either Option A or Option B are low.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	NA
Risk Rating justification	The USFS is legally required to identify areas under their management that are not appropriate for timber production, including lands not defined as forest lands. Timber harvests for the purpose of timber production are prohibited from taking place on lands not suitable for timber production. Therefore, it is unlikely that forest areas with low productivity would be subjected to commercial timber harvests. Further, LRMPs are required to maintain or restore the ecological integrity of all terrestrial ecosystems. These requirements are stipulated in the NFMA, the 2012 USFS Planning Rule (36 CFR Part 219, section 219.11) and FSH 1909.12 Chapter 60 - Forest Vegetation Resource Management. Numerous processes are in place to ensure that low productivity sites and other lands considered unsuitable for timber production are identified and managed to maintain and enhance ecosystem health, productivity and function. There are instances when timber is harvested on low productivity sites as a tool for achieving other management objectives. However, timber harvest does not, in any circumstances, lead to forest degradation, contribute to climate change, or diminish the long-term productivity of the forest.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Supply Base Verifiers	NA
Risk Rating justification	The USFS does not specifically use the terms HCS and HCV, however fundamental concepts are reflected in numerous laws, standards, and guidelines that protect HCVs and HCSs, and provide for limitations to ensure conservation objectives are achieved in those areas. Forest areas that align with HCS and HCV concepts are identified using multiple integrated data sources including the FIA. All HCVs are addressed in the 2012 USFS Planning Rule (36 CFR Part 219, section 219.11) and are either excluded from harvest or managed with the overarching objective of maintaining or restoring associated HCVs. All LRMPs contain management objectives, standards and guidelines for identification and protection of forests with HCVs. By law, all management activities on NFs must align with the associated LRMP. Well established processes for public notification and appeal provide added measures of assurance that laws, regulations and best practices are employed. Although it is possible that trees may be cut on forest areas that support HCSs and HCVs in support of non-timber oriented conservation objectives, commercial timber harvesting is prohibited on the majority of those areas. Within the NFS, nearly all forest areas that support both HCS and HCV attributes are classified as Wilderness Areas, Wild and Scenic River Corridors, Primitive Areas, Inventoried Roadless Areas, Research Natural Areas, National Monuments, and LSOG Reserves. All of these land classifications are protected areas. Commercial timber harvesting is legally prohibited or functionally excluded from all of these land classifications. In rare cases where commercial timber operations are conducted in areas that contain HCVs and HCSs, the management objectives and activities are required to maintain, restore or enhance HCV and HCS attributes. In other words, management interventions would occur only in the situation where the absence of these activities is likely to result in the loss of HCV and HCS. This approach is consistent with guidance for Indicator 3.2.3 which states that management is conducted with a focus on promoting sustainable land use practices and protecting these important forest resources for future generations. Therefore, there is a low risk that feedstocks would be sourced from areas where carbon emissions from harvesting require extended periods to replenish forest growth (i.e. carbon stocks) to a pre-harvest equivalent, where net emissions of GHGs are increased as a result of harvesting, or where there is a loss of conservation values.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that feedstock sourced is not in compliance with the principle of cascading use. The USFS uses a standardized appraisal process and bidding process ensuring timber sales are sold at appraised value or minimum bid rates, whichever is higher. Advertised and completed Timber Sales are documented and available on the USFS website.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that the right to collective bargaining and the freedom of association is not respected in the workplace. USFS policy and procedures ensure compliance with relevant Acts and Code of Regulations. USFS employees have a newly approved Master Agreement expiring in June 2029. Once approved by USFS Contracting Officers and a contract is signed, purchasers and their workers are notified of these rights. NLSB manages and documents NLSA cases presented by employers and by employees. Cases are posted on the NLSB website by status (i.e., open, closed, open blocked).
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that forced or compulsory labor is used on NF. USFS policy and procedures ensure compliance with contract requirements. USFS staff monitor project operations and can notify relevant authorities in case of observed non-compliances.
Risk Rating	Low Risk

United States	Indicator
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Northeast region (mostly Maine)	
4.1.3	Child labour shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that child labor is used on NF. The hazardous nature and regulated definition of forest operations exclude the possibility of child labor. USFS monitor project operations and can notify relevant authorities in case of observed non compliances.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that workers are discriminated against for reasons listed by the Indicator. USFS policy and procedures ensure compliance with contract requirements. USFS monitor project operations and can notify relevant authorities in case of observed non compliances. Workers have access to resources in case they believe they are treated unfairly.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that workers are not paid at least the legal minimum wage as prescribed by the Indicator. USFS policy and procedures ensure contractor compliance with contract and legal requirements. USFS monitor project operations and can notify relevant authorities in case of observed non compliances. Workers have access to resources in case they believe they are treated unfairly.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.6	Working hours shall comply with legal requirements.

Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that working hours are not in compliance with legal requirements. Resources for employers and for employees are accessible if they are treated unfairly. USFS monitor project operations and can notify relevant authorities in case of observed non compliances.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that workers do not have access to benefits required by law. Resources for employers and employees are accessible if they are treated unfairly. USFS monitor project operations and can notify relevant authorities in case of observed or informed non compliances.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	NA
Risk Rating justification	USFS employees are provided with training on a wide range of topics from worker rights and safety to technical aspects of their specific positions. There is a low risk that USFS employees do not receive the training required to competently fulfill their responsibilities. The USFS does assess the performance of contractors and review the contract, plan, and environmental standards and requirements before forest operations begin. Although the USFS does not systematically verify contractors training programs and workers knowledge to implement the conditions set out in all elements of the SBP standards, it does undertake inspections and field visits to ensure compliance of their operations. There is a low risk that contract workers do not have the necessary training to comply with this Indicator.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.

Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that USFS employees and contractor workers do not have access to workplace resolution mechanisms. The USFS has a detailed documented framework on workplace grievances and include employee resources for its implementation. In the private sector, workers have access to various mechanisms from different state and federal agencies.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that health and safety safeguards are not in place for USFS and contract workers. USFS have detailed procedures and measures to ensure personnel awareness of their responsibilities, of the risks involved associated with specific tasks as well as the resources at their disposal for the implementation of safety safeguards. Timber sale contracts include provisions on health and safety requirements. The USFS monitor and visit all contractor operations. Contractors and their workers must comply with OSHA and State Plans where applicable.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that negative social and community impacts are not unidentified and avoided. Economic and social impacts of NF lands on communities next to and dependent on those lands are considered in all phases of the planning process, including during the development of LRMPs and NEPA processes associated with timber sale projects. For the development of LRMPs, the 2012 USFS Planning Rule requires the USFS to engage the public during the scoping and assessment process, when developing a plan proposal, upon completion of a draft LRMP, and during the objection period associated with a new or revised LRMP. A similar approach is taken as part of the development of all proposed timber sale projects. LRMPs include economic and social assessments, as well as standards and guidelines for conservation of NF resources and values. The USFS has a very robust framework for evaluating potential impacts from LRMPs and

	proposed activities supported by the NEPA, 2012 USFS Planning Rule (codified in 36 CFR, Chapter II, Part 219), FSH 1909.12 Land Management Planning, and FSM 1900. Numerous laws, Presidential Executive Orders and memorandums direct the USFS to conduct robust consultation with tribes on decisions and actions that may substantially impact the tribes, their rights and resources. Well-established processes for public notification and appeal provide added measures of assurance that laws, regulations and best practices are employed. Projects undertaken on NFs sampled for this Indicator, along with associated NEPA documents, demonstrate that NFs are consistently identifying and considering potential impact to local communities caused by management decisions and activities. Many NFs also engage the public throughout the year through open houses, or scheduled meetings focused on specific areas of interest. Records of public engagement reflect robust consultation and engagement of stakeholders and representatives of local communities. Interviews of NF staff demonstrate awareness and sensitivity to community needs and concerns.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that feedstock sourcing on NFs do not contribute to the local economy, including employment. Several laws and regulations including the MUSYA, NFMA, NEPA and the 2012 USFS Planning Rule set forth mandates for incorporating economic conditions and potential impacts in the management of the NFS. As directed by the Twenty-Five Percent Fund Act, the PILT Act, and the Secure Rural Schools and Community Self-Determination Act NFs make significant monetary contributions to local communities on an annual basis in support of local schools and infrastructure. Detailed guidance is provided for conducting economic impact analyses in USFS Manuals, Handbooks, technical guides, and various tools such as IMPLAN that have been developed and adopted by the USFS. These documents, tools and processes clearly demonstrate the capability and intent of the USFS for ensuring management decisions and activities on NFs do not negatively impact local economies and communities. The USFS is further required to ensure there are no disproportionate adverse effects on underserved populations stemming from Agency decisions and activities. Economic impact assessments vary considerably throughout the NFS depending on the significance of potential impacts resulting from NF management activities. However, in all instances reviewed in the assessment of Indicator 4.2.2, NFs have identified positive effects on local communities

	stemming from the management of NFs including production of timber and other forest commodities; wages and salaries for USFS employees, timber purchasers, and contractors; purchase of goods and services in local communities; indirect expenditures of recreational visitors to NFs. Workers contracted by NFs are required by the SCA to be paid at a level equivalent to prevailing wages and not less than the federal minimum wage.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that HCVs essential for the fulfilment of basic needs of communities are not maintained or enhanced. Maintenance of healthy and functioning ecosystems and ecosystem services is a central management objective across the NFS. The USFS is mandated by several laws and regulations to identify and protect places and resources such as food and water that are essential for the fulfilment of basic needs of communities. Numerous USFS Manuals and Handbooks provide guidance and direction to USFS staff for ensuring the maintenance of resources and areas considered essential for meeting the basic needs of communities, and for ensuring effective public engagement and consultation in identifying and protecting those areas. Hunting and gathering rights of Native Americans are protected under established treaties. Native American cultural values and uses are addressed in LRMPs and project-level NEPA processes. Tribes must be consulted as part of forest land planning and NEPA processes. NF LRMPs include measures to protect, maintain, and enhance values and resources important to meeting basic needs of surrounding communities including watersheds, recreational opportunities, ecosystem function and ecosystem services, cultural values and resources, fish and wildlife. Interviews of NF staff demonstrate awareness and sensitivity to community needs and concerns.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk Indigenous Peoples and local communities legal,

	customary and traditional tenure and use rights are not identified, documented and respected on NFs. The USFS maintains a government-to-government relationship in recognition of the sovereign nation status conferred upon tribes, established through the US Constitution and treaties entered into with tribes. It is USFS policy to consult with tribes in the implementation of management plans and activities consistent with established treaties and with respect for other reserved rights. These policies are reflected in numerous Manuals and Handbooks. NEPA processes require the USFS to identify affected communities and use rights, and to consider mitigation actions to avoid or minimize negative socioeconomic and environmental impacts. Tribal Relations staff and/or Heritage Program Officers are located at national and regional offices, as well as within NFs. Interviews with staff, existing MOUs and other formal agreements, as well as LRMPs and project-level NEPA documents demonstrate the USFS is actively engaging with tribes and local communities, identifying and protecting legal, customary, and traditional tenure and use rights, and pursuing opportunities for co-stewardship of NFs with local tribes. As a federal agency, the USFS shares a federal trust responsibility to protect the safety and well-being of the federally-recognized tribes. The USFS is authorized through 25 USC Chapter 32A to ensure tribal access to NFs to the “maximum extent practicable” for traditional and cultural uses. Several Presidential Executive Orders direct federal agencies to consult with tribes on matters that may affect their rights, resources and interests.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk grievance and dispute mechanisms are not in place for the resolution of tenure and use rights of the forest and other land management practices on NFs. Current land ownership records are recorded and maintained at county courthouses and on databases administered by the USFS. Land ownership records include legal descriptions of each property as well as all legal use rights and encumbrances. The USFS is legally obligated to consult with interested stakeholders and the general public in advance of implementing proposed decisions and management activities. These consultations provide groups and individuals with processes for expressing concerns throughout the planning process, and to potentially resolve concerns before they become disputes. Processes for formal objections and appeals are readily available and well-known to interested members of the general public and advocacy organizations. The USFS pre-decisional review process and remedies associated with proposed projects are outlined in federal regulations. Corollary processes for filing pre-decisional objections at

	the land management planning level are similarly codified in law. There are also post-decision legal administrative remedies available to other agencies and the public. The US has a robust legal framework for pursuing civil disputes. Disputes involving legal tenure and use rights are typically addressed in the court system if informal resolution is not achieved through arbitration or negotiation. There are ample examples of appeals and lawsuits having been filed in opposition to USFS proposed plans and activities. These records offer strong evidence of a functioning system for receiving and resolving disputes.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that tribal rights are not identified on NFs, and that if FPIC is not achieved for the proposed activities, an accommodation process is not put in place. Although UNDRIP is not explicitly adopted in US law, and FPIC is not explicitly referenced in US law of USFS policy, the core components of both UNDRIP and FPIC are represented in existing laws and policies. Interviews with USFS staff, as well as examples of correspondence and agreements indicate that the USFS is actively engaged in collaboration with neighboring tribes, recognizing their standing as sovereign nations, and incorporating tribal perspectives as appropriate in their management. Tribal rights are identified, respected and protected. On past occasions when tribal interests have not been adequately protected, resolutions have been agreed upon, including measures to prevent similar lapses from occurring in the future. The USFS is legally obligated and organizationally committed to upholding the federal trust responsibility to federally recognized tribes by protecting tribal rights, resources and associated interests on NFs. Numerous regulations, directives, and agency memorandums encourage and/or require the USFS to strengthen the government-to-government relationship between the United States and Indian tribes, and to ensure meaningful consultation and collaboration with tribal representatives in the development of policies, decisions and proposed activities that have tribal implications. There is a clear trend for increased USFS commitments to collaboration, cooperation consultation and co-stewardship with tribes, including significant funding to tribes for addressing tribal priorities such as watershed and habitat improvements, restoration, management of invasive species, and fuels reduction. Recently developed strategies, plans, and guides as well as accomplishments detailed in annual reports indicate the USFS and US federal government are committed to integrating collaboration and

	consultation with tribes into their core objectives and standard operating procedures.
Risk Rating	Low Risk

United States Northeast region (mostly Maine)	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	NA
Risk Rating justification	There is a low risk that designated cultural heritage sites are not preserved. The USFS has developed numerous resources to support staff in the identification and protection of cultural resources, including training, guidebooks, and technological tools. LRMPs set goals, guidance and standards for identification and protection of heritage sites including cultural resources. Correspondence shows that USFS staff are active in pursuing protections for cultural resources as well as in consulting with tribes. NEPA and the 2012 USFS Planning Rule require the USFS to identify cultural resources that may be impacted by management decisions and activities, and to assess potential impacts to those resources. Known cultural sites are identified on maps and delineated on the ground in advance of implementation. Cultural sites are removed from timber sale areas. Timber sale contracts include provisions for protecting cultural resources and are enforced during regular site inspections of timber sales. Staff interviewed demonstrated awareness and knowledge of applicable laws and procedures for identifying and protecting cultural sites, as well as the importance of consulting with local tribes and other experts. While some cultural sites have been damaged either through looting by members of the public, or as a result of project implementation, there is no evidence to indicate those instances are systemic or frequent in occurrence. Records also indicate that the USFS pursues resolution when damage occurs.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Annex 2a: EU RED II Supply Base Evaluation

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).