



Supply Base Report:

Lignetics Group Inc. - Broomfield, CO Main (Initial) 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:	Lignetics Group Inc. - Broomfield, CO
Producer address:	34363 Lake Creek Dr., 97327 Brownsville, United States
SBP Certificate Code:	SBP-12-19
Geographic position:	39.915521, -105.122500
Primary contact:	Tony Woods, +1 315 244 1309, TWoods@lignetics.com
Company website:	https://lignetics.com/
Date report finalised:	28 Oct 2025
SBR reporting period from:	01 Jul 2024
SBR reporting period to:	30 Jun 2025
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	17 Dec 2025
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Feedstock origin (countries)	United States (California, Oregon, and Washington), Canada (British Columbia (select Regional Districts))
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

The Lignetics Group specializes in wood pellet, shavings, and flour products used in home heating, barbeque, animal bedding, and industrial applications. Its pellet mill in Brownsville, Oregon makes wood pellets and shavings from Douglas-fir (*Pseudotsuga menziesii*) processing residues. These processing residues are sourced from regional sawmills and lumber mills.

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

Number of employees: 42

Annual maximum production capacity (metric tonnes): 108862

Number of direct feedstock suppliers: 11

Approximate number of feedstock sub-suppliers: 35

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

The organization sources processing residues from regional forest product mills. These suppliers may source Douglas-fir logs from private, public or tribal landholdings located in the US States of California (select counties), Oregon and Washington. These logs may be sourced via stumpage (i.e., direct purchase of standing timber by a mill) or gatewood (i.e., a mill only purchases certain log grades from the purchaser of the stumpage). Forest product mills and gatewood suppliers may use their own logging crews or contract independent logger. Logs are transported via truck to forest product mills for milling into lumber and other dimensional wood products. The byproduct of initial processing includes bark, woodchips, and sawdust. Lumber and other dimensional wood products that are kiln-dried may be planed or further cut to customer-specified dimensions. The byproduct of this additional processing often includes dry shavings and sawdust.

Some suppliers located in Oregon and Washington source secondary forest products of Douglas-fir from mills located in coastal regions of British Columbia. After purchase and import, the suppliers process these secondary forest products into value-added products. The resulting processing residues are sold to the biomass producer. These processing residues represent a tiny fraction of the feedstock delivered to the biomass producer. Suppliers transport processing residues from their mills to the organization's facilities in Brownsville, Oregon, where they are transformed into pellets and animal bedding (shavings). All trucks delivering feedstock must have a load ticket that confirms the origin of the material. Upon scaling at the organization's facilities, a scale ticket is issued, and the quantities and physical description are recorded in the organization's scaling software.

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	United States
Area/Region	California, Oregon, and Washington
Exclusions	None

Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, 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:	
The organization sources part of its feedstock from USFS lands via a duly recognized RRA with all low risks; and the rest is sourced via an SBE for the US States of California, Oregon, and Washington. · SBP-RRA-US-NF-FOR v1.0 Interim RRA: - o Total acres of USFS in OR (15,698,133) and WA (9,337,356): 25,035,489 - o Total acres of USFS for select counties in CA: 11,330,399 - o Source: USFS Land Areas Report (LAR) - as of September 30, 2022 · SBE (CA): - o Total acres of the select counties in CA: 46,642,672 acres - o Total acres of select counties without USFS lands = SBE area = 35,312,273 · SBE (OR and WA): - o Total acres of OR (62,962,560) and WA (45,630,720): 108,593,280 - o State acres without USFS lands = SBE area = 83,557,791 · TOTAL SBE acres = 118,870,064 SBP-RRA-CA-BC-FOR_v2.0-RRA-for-British-Columbia-FOR_Interim Select Regional Districts: 29,937,211 hectares	
Feedstock types included in SBE:	Processing residues
Includes EU RED SBE:	No
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):	62821761.0000
Map(s) of the Supply Base area:	
Figure 1. Map of Brownville, Oregon Supply Base (Oregon and Washington)	

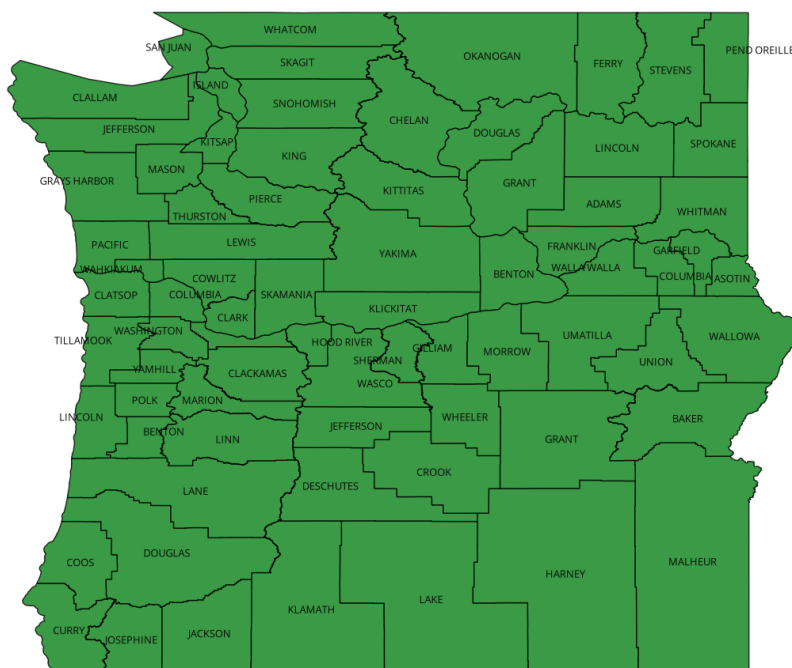


Fig. 2: Map of Brownville, Oregon Supply Base (select counties of California: Butte, Colusa, Del Norte, El Dorado, Glenn, Humboldt, Lake, Lassen, Marin, Mendocino, Modoc, Napa, Nevada, Placer, Plumas, Shasta, Sierra, Siskiyou, Sonoma, Sutter, Tehama, Trinity, Yolo, and Yuba). Source: <https://www.randymajors.org/>

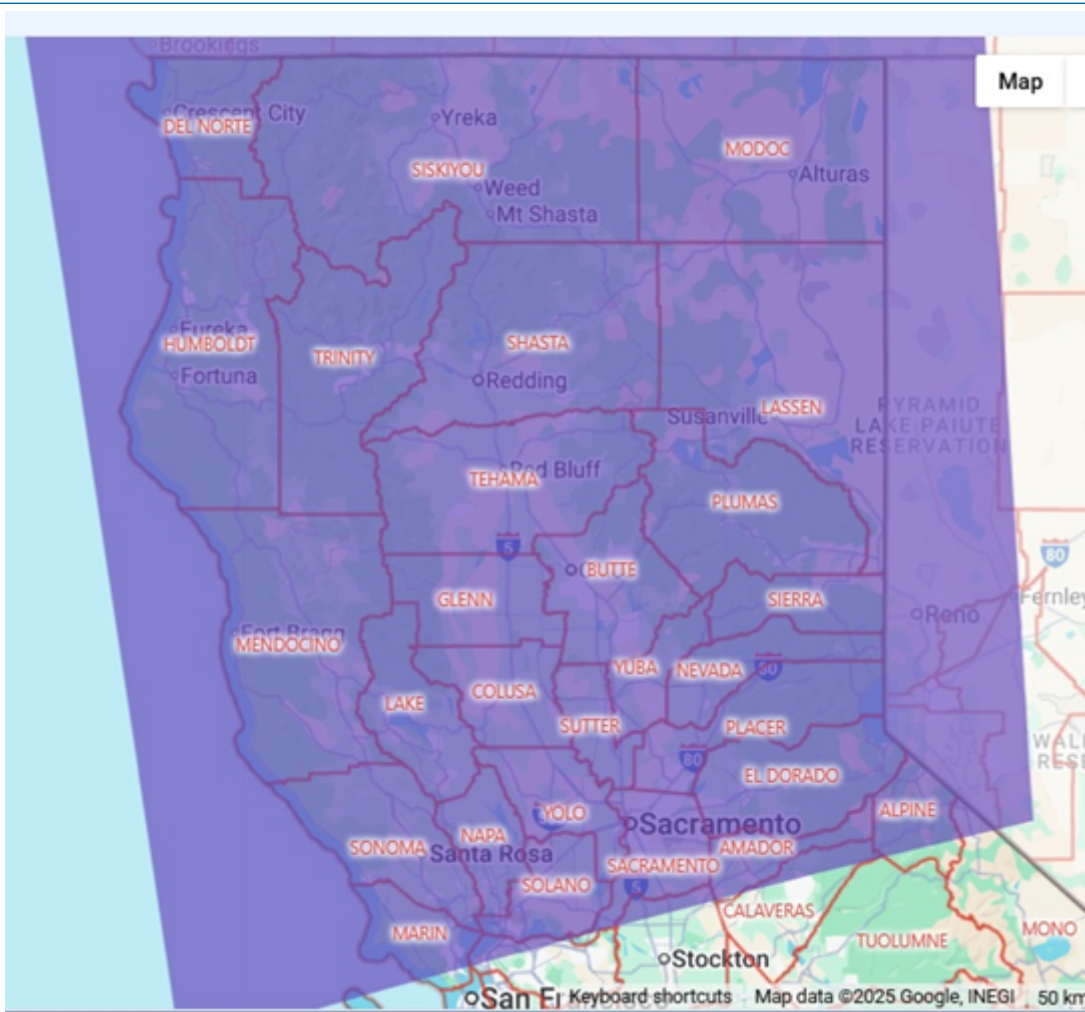
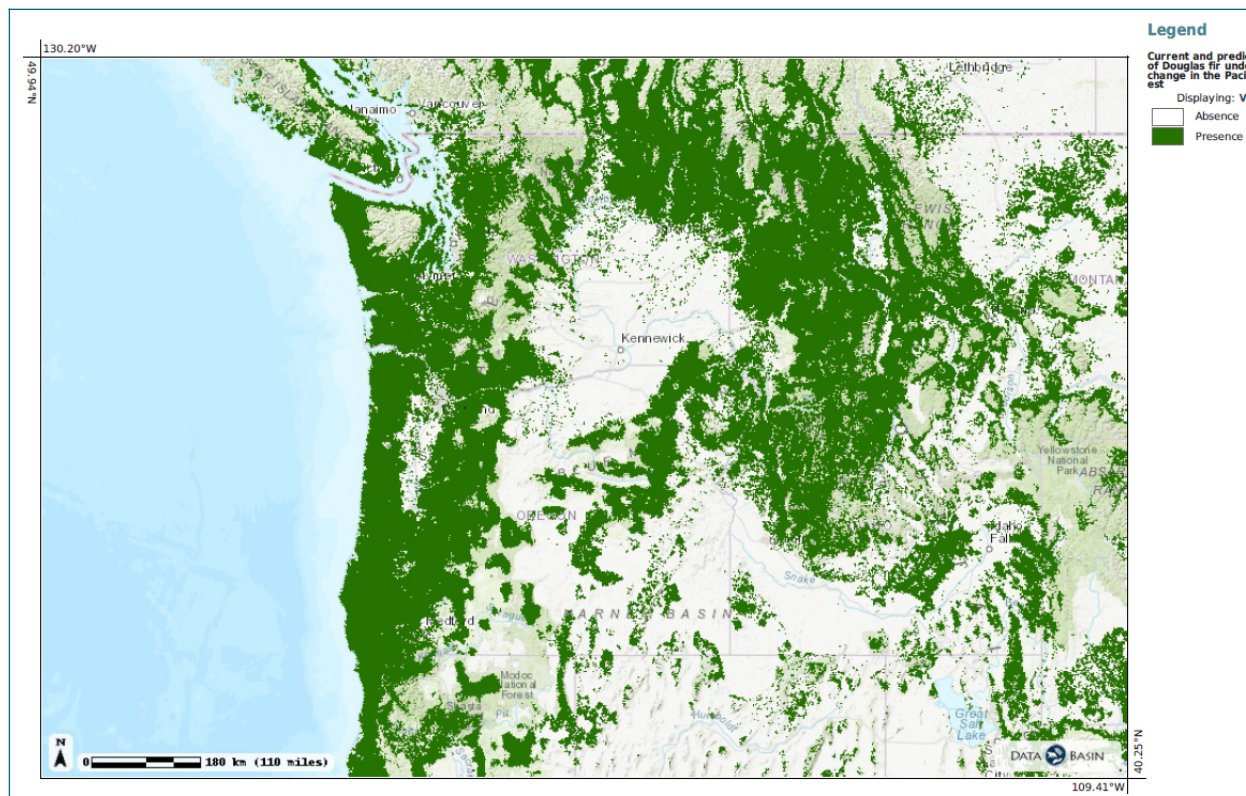


Fig. 3. Current Natural Range of Douglas-fir
(Source: <https://databasin.org/datasets/38a6f62de3b44329bfb797f1afe9005f/>)

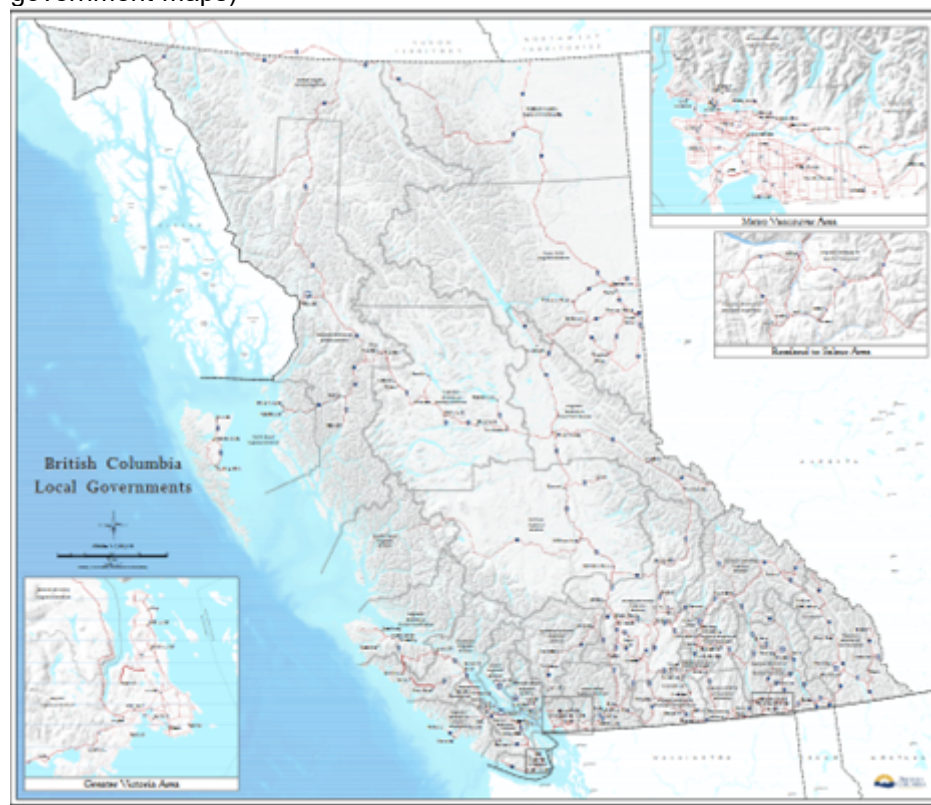


Country	Canada
Area/Region	British Columbia (select Regional Districts)
Exclusions	See description above.
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
The organization uses the SBP-RRA-CA-BC-FOR_v2.0-RRA-for-British-Columbia-FOR_Interim for feedstock sourced from British Columbia, Canada	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No

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):	29937211.0000

Map(s) of the Supply Base area:

Fig. 4: Map of Brownville, Oregon Supply Base (select Regional Districts of British Columbia: Alberni–Clayoquot, Capital, Cariboo (south of the Chilcotin River and the town of Williams Lakes), Central Coast, Central Okanagan, Comox Valley, Cowichan Valley, East Kootenay, Fraser Valley, Kootenay Boundary, Mount Waddington, Nanaimo, North Okanagan, Okanagan–Similkameen, qathet, Squamish–Lillooet, Strathcona, Sunshine Coast, and Thompson–Nicola). (Source: https://en.wikipedia.org/wiki/Regional_district and <https://www2.gov.bc.ca/gov/content/governments/local-governments/facts-framework/local-government-maps>)



2.3 Feedstock information

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

b. Volume of primary feedstock: 0

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

Pseudotsuga menziesii

Douglas-fir

d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? N/A

Explanation: No sourcing of primary feedstock.

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 0.00

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 100.00

g. Proportion of feedstock composed of or derived from saw logs by weight (%): 0.00

h. Indicate how you determine the proportion of saw log: Specification used by the sawmill closest to where the wood was grown.

i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 0.00

j. Select forest type(s) where the primary feedstock was sourced from: Other

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:

m. Volume of processing residues feedstock: 1-200,000 tonnes

Physical form of the feedstock: Sawdust, Other (specify)

n. Share of SBP-recognised system claim for processing residues:

0.00 % SFI

0.00 % PEFC

0.00 % FSC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Sawdust, Other (specify)

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 100 %

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 1417000.00 m³

Explanation: Per a USFS study, about 25% of a harvested log ends up as processing residues. Over a 10-year period from 2010-2020, the average annual allowable cut for Douglas-fir in the three-state region (CA, OR, and WA) was conservatively 5,664,000 m³/yr. $5,664,000 \times 0.25 = 1,416,000$ m³/yr of processing residues. Sources: https://www.srs.fs.usda.gov/pubs/misc/ag_654/volume_1/pseudotsuga/menziesii.htm https://www.fs.usda.gov/pnw/pubs/pnw_rp117.pdf https://www.fs.usda.gov/pnw/pubs/pnw_rp400.pdf <https://www.oregon.gov/odf/aboutodf/documents/2023-odf-ors-526255-long-range-management-marketing-harvest-report.pdf> <https://www.oregon.gov/odf/board/bof/20230104-bof-record-item-05.pdf> <https://research.fs.usda.gov/treearch/64309> <https://research.fs.usda.gov/pnw/products/dataandtools/production-prices-employment-and-trade-northwest-forest-industries-1958> For British Columbia, over the 2008-2018, the amount of timber harvested annually on public land has been below the Allowable Annual Cut. The average Allowable Annual Cut was 83 million cubic metres per year and the average harvest on these areas was 67 million cubic metres per year. Using a similar assumption that 25% of a log volume ends up as residuals, that would mean that there are approximately 17 million m³ of

residuals potentially available from Crown Lands for all species. Assuming that Douglas-fir is 10% of this volume, that 1,700,000 m³/yr of residuals. Note that of that an extremely small fraction of material from British Columbia ends up in the organization's finished product, so its contribution to this estimate is likely less than 0.01% (<1700 m³/yr.). Conservatively, we could consider up to 1000 m³/yr, though the true value is well below this. Sources:
<https://www.env.gov.bc.ca/soe/indicators/land/timber-harvest.html>
<https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/timber-supply-review-and-allowable-annual-cut/allowable-annual-cut-timber-supply-areas>

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

The SBE was prepared for the United States of America, Pacific Northwest region (California (select counties), Oregon, and Washington). There currently is no SBP-recognized Regional Risk Assessment (RRA) specific to the region, though one is in development. This section and the Risk Assessment may require updating when the RRA is complete.

Country: United States of America (USA)

Area/sub-scope: refer to Supply Base map(s)

Risk Assessment(s) used:

1. Non-USDA Forest Service Lands (e.g., private, state, tribal, county government, BLM, military, etc.): Biomass Producer's own risk assessment, contained in the ST 1 checklist below. The organization has concluded low risk for all indicators except for 2.1.2, 2.1.3, 2.2.1, and 2.2.2.
2. USDA Forest Service lands: Sustainable Biomass Program (SBP) Regional Risk Assessment for US National Forest (SBP-RRA-US-NF-FOR v1.0 Interim RRA). This RRA has concluded low risk to all SBP ST 1 indicators.

The SBE thus only covers Non-USDA Forest Service Lands of the Supply Base.

3.2 Conflicts with applicable national and sub-national legislation

The organization has not identified any conflicts between the applicable legislation and SBP requirements.

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: United States

Area/sub-scope:

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:	
FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has identified HCVs with specified risks for HCV Categories 1 (Species Diversity) and 3 (Rare Ecosystems) (Refer to the FSC-US NRA for justification and explanation of the rationale for the low-risk conclusion). Threats to HCVs from forest management activities are identified in the FSC-US NRA.	
Mitigation measure:	
The organization's mitigation measures are commensurate with the risks to HCVs identified in the FSC-US NRA, V1-0, as well as its position in the supply chain. The following are either provided to suppliers of processing residues or required in binding agreements: • Summary of management recommendations for Old-growth and the Klamath-Siskiyou CBA provided to suppliers from third-party publications; • Requirement for suppliers who source primary material (e.g., logs) to use loggers trained per state or SFI-recognized programs (e.g., California Licensed Timber Operator (LTO), Oregon Professional Logger (OPL) qualification, Washington Master Logger Program (MLP); • Agreements that require legal compliance and avoidance of sourcing from FSC-specified risk areas without implementation of mitigation measures; and • Supplier risk assessment and annual audit program.	
Monitoring and outcomes:	
• HCV management recommendations publications are provided to suppliers during the supplier risk assessment. The percentage of suppliers is tracked as a monitoring outcome; • Each supplier must have signed a binding written agreement. The percentage of signed effective agreements is tracked as the monitoring outcome; and All suppliers must undergo an initial risk assessment to become a supplier. Existing suppliers are audited by sample annually. The percentage of existing suppliers sampled annually is tracked as the monitoring outcome.	

Country: United States
Area/sub-scope:
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:	
FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has identified HCVs with specified risks for HCV Categories 1 (Species Diversity) and 3 (Rare Ecosystems) (Refer to the FSC-US NRA for justification and explanation of the rationale for the low-risk conclusion). Threats to HCVs from forest management activities are identified in the FSC-US NRA.	
Mitigation measure:	
The organization's mitigation measures are commensurate with the risks to HCVs identified in the FSC-US NRA, V1-0, as well as its position in the supply chain. The following are either provided to suppliers of processing residues or required in binding agreements: · Summary of management recommendations for Old-growth and the Klamath-Siskiyou CBA provided to suppliers from third-party publications; · Agreements that require suppliers who source primary material (e.g., logs) to use loggers trained per state or SFI-recognized programs (e.g., California Licensed Timber Operator (LTO), Oregon Professional Logger (OPL) qualification, Washington Master Logger Program (MLP); · Agreements that require legal compliance and avoidance of sourcing from FSC-specified risk areas without implementation of mitigation measures; and · Supplier risk assessment and annual audit program.	
Monitoring and outcomes:	
· HCV management recommendations publications are provided to suppliers during the supplier risk assessment. The percentage of suppliers who have been provided with these publications is tracked as a monitoring outcome; · Each supplier must have signed a binding written agreement. The percentage of signed effective agreements is tracked as the monitoring outcome; and All suppliers must undergo an initial risk assessment to become a supplier. Existing suppliers are audited by a sample annually. The percentage of existing suppliers sampled annually is tracked as the monitoring outcome.	

Country: United States	
Area/sub-scope:	
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:	
FSC-US NRA, V1-0, has concluded specified risk for conversion of forestland to non-forest use for select counties in Oregon and Washington.	
Mitigation measure:	
· Sourcing from suppliers with SFI Chain of Custody (COC), Certified Sourcing (CS), and/or Fibre Sourcing (FS) certifications; and/or FSC COC and/or CW certifications; · Signed binding supplier agreements that require suppliers not to source from known conversion sources; and · Completed supplier risk assessments to identify each one's sourcing area.	
Monitoring and outcomes:	
· Number of certified suppliers (SFI, PEFC, and/or FSC COC). The percentage of suppliers who carry one or more of these certifications will be recorded; · Review of supplier contracts/ agreements to ensure inclusion of non-conversion clauses. The percentage of suppliers with such clauses will be recorded; and All suppliers must undergo an initial risk assessment to become a supplier. Existing suppliers are audited by a sample annually. The percentage of existing suppliers sampled annually is tracked as the monitoring outcome.	

Country: United States

Area/sub-scope:	
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:	
FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Categories 1, 2 and 5, and specified risks for Categories 3 and 4 for select counties of the US States of Oregon and Washington.	
Mitigation measure:	
· Sourcing from suppliers with SFI Chain of Custody (COC), Certified Sourcing (CS), and/or Fibre Sourcing (FS) certifications; and/or FSC COC and/or CW certifications; · Signed binding supplier agreements that require suppliers to adhere to BMPs; and · Completed supplier risk assessments to identify each one's sourcing area.	
Monitoring and outcomes:	
· Number of certified suppliers (SFI, PEFC, and/or FSC COC). The percentage of suppliers who carry one or more of these certifications will be recorded; · Review of supplier contracts/ agreements to ensure inclusion of BMP clauses. The percentage of suppliers with such clauses will be recorded; and All suppliers must undergo an initial risk assessment to become a supplier. Existing suppliers are audited by a sample annually. The percentage of existing suppliers sampled annually is tracked as the monitoring outcome.	

Country: Canada
Area/sub-scope:
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:	
Crown: • Woodland Caribou habitat due to the incomplete recovery plan development and/or implementation; • SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion; • Intact Forest Landscapes due to lack of provincial recognition and implementation mechanism; and • Priority old growth forest deferral areas and protection has not been completed and finalized. Private Managed Forest Land and Other Private Land: There is federal and provincial regulatory framework for maintaining biodiversity values. On private managed forest land and other private land, due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land and other private land in British Columbia.	
Mitigation measure:	
Background: According to the provincial government, approximately 95% of its timber is publicly owned (Crown Land). The BC government authorizes the rights to harvest Crown timber through forest tenures. Approximately 5% of the province's timber occurs on private forestlands. Of these, roughly half are enrolled in the province's Private Managed Forest Land Program (PMFLP). Private timber marks are required to transport logs from privately-owned land and are administered by the BC government. Landowners who are not part of PMFLP, or who do not have their private land in a Forest Act license, are required to follow local government by-laws on their property.	

All private landowners are subject to the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Wildlife Act, Wildfire Act, Assessment Act, and the federal Migratory Birds Convention Act, Fisheries Act and Species at Risk Act.

Under Canadian law, any citizen can initiate a private prosecution for a criminal or regulatory offense if they believe one has occurred. So, citizens in British Columbia can allege noncompliance with environmental laws, though their options are different from those of government regulators. Citizens can report infractions to authorities, and in some cases, initiate a private prosecution. The specific legal and procedural avenues for doing so depend on the type of law and the party involved. For most provincial statutes, enforcement is handled by a government body or regulator, while specific laws may grant a private right of action for citizens to sue.

Web searches confirm examples of citizens that have sought legal action against forest managers for legal violations:

- Haida Gwaii logging claim (2025): In April 2025, the B.C. Supreme Court ruled against a C\$75 million compensation claim by Teal Jones, a forestry company, over the protection of old-growth forests on Haida Gwaii.

Web searches confirm that the Forest Appeals Commission (FAC) includes rulings on regulatory enforcement on Crown and Private lands:

- <https://www.bcfac.ca/act/private-managed-forest-land-act/>
- <https://www.bcfac.ca/act/wildfire-act/>
- <https://www.bcfac.ca/act/forest-practices-code-of-british-columbia-act/>

Of note, a 2025 FAC ruling punishes a timber company for violations of old growth protection rules per the Forest And Range Practices Act that occurred between 2012-2016.

Web searches confirm that the Environmental Appeals Commission (EAC) includes rulings on regulatory enforcement on Crown and Private lands:

- <https://www.bceab.ca/act/water-sustainability-act/>
- <https://www.bceab.ca/act/wildlife-act/>

Of notice, a 2025 EAC ruling against a cattle and timber producer for unauthorized works in violation of the Water Sustainability Act.

The Natural Resource Officer Service (NROS) can investigate legal violations involving Crown and Private lands, including enforcement of the Forest Act, Range Act, Wildfire Act, Forest and Range Practices Act, Land Act, Water Sustainability Act, and Heritage Conservation Act. NROS prepares annual reports summarizing the results of its activities.

The province publishes periodic State of British Columbia's Forests reports, the most recent of which was published in 2010. The report covers Crown and private forestlands. It notes that the dominant silvicultural system is currently clearcutting with reserves for maintaining stand-level biodiversity. The use of clearcutting with reserves and variable retention has increased since the late 1990s, and the average size of clearcuts decreased. Reduced failures have been reduced by 90% since 1989. While the report demonstrates evidence of implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, it used to be updated

every 2-4 years. The province's lack of a recent report makes it difficult to understand how trends described in the report have changed since 2010.

A more recent report by Gilani and Innes (2020), *The State of British Columbia's Forests: A Global Comparison*, concludes that British Columbia ranks high among other jurisdictions on several key sustainable forest management parameters, such as forest policy, wood supply, biodiversity conservation, climate change and forest products. The report relies on the FAO Global Forest Resources Assessment (2015) and other sources to compare BC's performance to seven other nations. Gilani and Innes report that BC has established over 6482 old growth management areas for biodiversity conservation, as well as many other legally protected areas. Over 85% of the province's forest land has been designated for multiple uses.

The organization's suppliers currently source secondary products (e.g., lumber, peeler cores, etc.) from the Coastal BC region.

Per review of the BC Major Timber Processing Facilities Survey (2022), several large lumber, OSB, Plywood, Veneer, and Panel mills of the Coastal and South regions carry SFI, PEFC or FSC certification (>80%). Mills that introduce non-certified material into supply chains must have measures in place to identify and conserve Forests of Exceptional Conservation Value or High Conservation Value per each scheme's definitions.

Over 70% of BC's forestland carries FSC or PEFC-recognized certification (e.g., SFI, CSA), meaning that a high percentage of Crown Lands are subject not only to review by government agencies and the Forest Practices Board, but also external auditing firms with expertise in forest and wildlife management. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

The amount of processing residues that originate from Douglas-fir materials sourced from British Columbia is well under 1%. As such, the organization's mitigation measures are commensurate with its suppliers' position in the supply chain.

Woodland caribou:

The natural range of Douglas-fir in British Columbia overlaps with parts of the Southern Mountain Caribou populations.

Based on geographic and ecological data from British Columbia, some Southern Mountain caribou herds overlap with the natural range of Douglas-fir (*Pseudotsuga menziesii*), particularly in the Interior Wet Belt and Montane forest zones. Douglas-fir is common in mid-elevation forests of southeastern BC, which are also key seasonal habitats for many Southern Mountain caribou herds.

The following surviving herds are most likely to overlap with Douglas-fir forests:

1. Columbia North Herd

- Located in the **Columbia Mountains**.
- Uses **mid-elevation forests** in spring and fall.
- Douglas-fir is a dominant species in these zones. [wildsight.ca]

2. Columbia South Herd

1. Occupies areas near Revelstoke and Nakusp.
2. Douglas-fir is prevalent in the **Montane Spruce and Interior Cedar-Hemlock zones**.

3. Central Selkirk Herd

- Found in the **Selkirk Mountains**, which include Douglas-fir forests at lower elevations.
- Herd recovery efforts include maternity pens in Douglas-fir dominated areas. [fws.gov]

These three herds are subject to the Southern Mountain Caribou Conservation Agreement (2020), which is a joint effort between Canada, BC, and Indigenous Nations that focuses on habitat protection, predator management, and Indigenous stewardship.

These three herds also all have draft Phase 1 recovery plans. Confirmation that there are recovery plans in line with federal requirements is consistent with FSC Controlled Wood control measures recommended by FSC Canada. Recent documented significant habitat losses in BC do not affect these populations. Updates on Caribou Recovery Actions are posted by the Provincial government.

Low risk can be confirmed through 1) sourcing of Douglas-fir from outside of the current caribou range (i.e., Coastal Douglas-fir populations); and/or 2) sourcing of Inland Douglas-fir from areas with caribou recovery plans. For item 2, if evidence from suppliers demonstrates that Inland areas were sourced from, we will periodically verify updates to the provincial Caribou Recovery Program website to determine if any changes to our sourcing policies are necessary.

SAR Recovery Plans:

A 2023 publication by the BC Forest Practices Board concluded that where legal measures are in place for habitat protection, operational-level forest planning and practices were consistent with those legal requirements. Over 70% of BC's forestland carries FSC or PEFC-recognized certification (e.g., SFI, CSA), meaning that a high percentage of Crown Lands are subject not only to review by government agencies and the Forest Practices Board, but also external auditing firms with expertise in forest and wildlife management. While the organization cannot force its suppliers to purchase certified material, since a significant part of the land base is certified, there is a high likelihood that SAR Recovery Plans are being implemented. The stages of completion of Recovery documents can be viewed on the provincial SAR website. Note that many species are not forest-dependent. The Forest Practices Board (FPB) publishes an annual report of its audit inspections and other activities on Crown Lands. The 2024-25 report includes a review of complaints and concerns about negative impacts to wildlife and Species at Risk. FPB also publishes recommendations based on investigations and the results of its audit reports. A review of recommendations from 2021-2024 confirms that Species at Risk issues are regularly reviewed.

Low risk can be confirmed via verification of the percentage of companies who have adopted recognized forest management certifications in the province (e.g., FSC, SFI, CSA, etc.) and/or review of the FPB website for recommendations and appeals that affect old growth and other biodiversity values. If the organization finds decisions that may negatively affect these values, we will contact FPB to determine if we should alter our sourcing practices for suppliers sourcing from BC.

Intact Forest Landscapes:

The Global Forest Watch monitors the loss of Intact Forest Landscapes (IFLs) and publishes a new map/dataset every 3-5 years currently. The most recent dataset shows IFLs from 2016-2020. A reduction in IFL area can be due to wildfire and other natural disturbances or due to human encroachment. Per the *Tree Cover Loss due to Fire* and *Tree Cover Loss due by dominant driver* layers on Global Forest Watch, the main drivers of IFL loss are fire and other natural disturbances, though logging remains a threat.

Low risk can be confirmed via verification of the percentage of the sourcing area that is certified to recognized forest management certifications (e.g., FSC, SFI, CSA, etc.) and/or periodic review of the Global Forest Watch website for significant updates to IFL datasets. If there are significant updates to the datasets, as indicated by the year(s) in each IFL layer, the organization will review these to determine if we

need to modify sourcing practices. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

Priority old growth forest deferral areas and protection:

According to the publication, *Backgrounder: Status of BC's Old Forests 2021* by the BC Council of Forest Industries, roughly 75% of the old growth is protected and unharvested at the provincial level, leaving about 25% unprotected and within the Timber Harvesting Land Base. The vulnerability to harvest varies by region, with 88% protected on the coast and 76% protected in the Southern Interior, which are the main Douglas-fir producing regions accessible to US markets.

Industries that may use larger diameter logs typically include lumber, though they may also include veneer and plywood mills that use Douglas-fir peeler logs. Per review of the BC Scaling Manual (2021), Douglas-fir peeler logs range in diameter from 15 to >24 inches depending on the grade. Douglas-fir logs used for lumber can start at 24 inches in diameter for lower grades and at 30 inches for higher ones.

Peeler logs require straight grain, uniform color, and annual ring counts of at least 8 per inch.

Specifications for lumber-grade logs are similar. These characteristics are typical of managed second-growth Douglas-fir, not old growth, which often has spiral grain, large knots, and irregular growth patterns.

Lumber grade logs are classified based on visible characteristics and potential for lumber recovery, not age.

The Interior Timber Grades include:

Grade 1 (Premium Sawlog) and Grade 2 (Sawlog) – these are typically logs from younger, faster-growing second-growth stands.

Logs must meet criteria for size, soundness, and recoverable volume, but not age.

The grading system prioritizes merchantable lumber recovery, which is more consistent with second-growth Douglas-fir, due to:

- More uniform wood quality.
- Easier processing.
- Higher availability from managed forests.

Old growth Douglas-fir trees are often larger, older, and structurally complex, but may contain heart rot, hollow centers, or defects that reduce lumber recovery. These defects often result in logs being graded as rejects or non-lumber grades, not premium sawlogs.

Scaling regulations favor logs with high recovery potential, which are more typical of second-growth forests.

Operational harvesting of old growth is increasingly restricted or deferred under provincial policy previously mentioned.

Due to the high level of protections afforded to existing old growth forests in the province, low likelihood of types of materials imported by our suppliers to be sourced from old growth forests and logs, and our suppliers' position in the supply chain (i.e., importers of secondary materials), we conclude **low risk**.

Low risk can be confirmed via verification of the percentage of the sourcing area that is certified to recognized forest management certifications (e.g., FSC, SFI, CSA, etc.) and/or periodic review of the updates to the BC Provincial Government's Old Growth Forest Stewardship policies. Evidence from our

suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

Per the information in the **Background** section, the organization concludes **Low Risk for Private Managed Forest Land and Other Private Land** due to there being enforcement mechanisms for laws related to biodiversity and that citizens can file lawsuits and/or alert regulatory authorities over suspected violations. Private forest management accounts for less than 5% of the forestland in the province, meaning that an extremely small percentage of our feedstock originates from private forest in BC. Furthermore, reports from 2010 and 2020 demonstrate that the BC has mechanisms to evaluate performance to landscape- and stand-level biodiversity. To ensure that risk remains low, we will conduct an periodic review of provincial websites for updates to the State of the Forest Reports. If a new report concludes that changes to biodiversity practices are warranted, we will consider changes to our sourcing policies.

Summary of mitigation measures:

Crown Land

1. **Caribou:** source Douglas-fir from outside of the current caribou range (i.e., Coastal Douglas-fir populations); and/or 2) source Inland Douglas-fir from areas with caribou recovery plans. All Inland sourcing areas are under caribou recovery plans. For item 2, if evidence from suppliers demonstrates that Inland areas were sourced from, we will periodically verify updates to the provincial Caribou Recovery Program website to determine if any changes to our sourcing policies are necessary.
2. **SAR:** verification of the percentage of companies who have adopted recognized forest management certifications in the province (e.g., FSC, SFI, CSA, etc.) and/or review of the FPB website for recommendations and appeals that affect old growth and other biodiversity values. If the organization finds decisions that may negatively affect these values, we will contact FPB to determine if we should alter our sourcing practices for suppliers sourcing from BC.
3. **IFL:** verification of the percentage of the sourcing area that is certified to recognized forest management certifications (e.g., FSC, SFI, CSA, etc.) and/or periodic review of the Global Forest Watch website for significant updates to IFL datasets. If there are significant updates to the datasets, as indicated by the year(s) in each IFL layer, the organization will review these to determine if we need to modify sourcing practices.
4. **Priority Old Growth:** verification of the percentage of the sourcing area that is certified to recognized forest management certifications (e.g., FSC, SFI, CSA, etc.) and/or periodic review of the updates to the BC Provincial Government's Old Growth Forest Stewardship policies.

Private Managed Forest Land/ Other Private Land

1. Conduct an periodic review of provincial websites for updates to the State of the Forest Reports. If a new report concludes that changes to biodiversity practices are warranted, we will consider changes to our sourcing policies.

Monitoring and outcomes:

Crown Land

Caribou:

2025: Per interviews with suppliers and sampling of their documentation, all sources of Douglas-fir were from Coastal British Columbia that is outside of the caribou range. Avoidance of impacts to caribou populations is thus confirmed.

SAR and Old Growth:

2025: 73% of BC's forest are certified. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

Review of the FPB website for recommendations and appeals demonstrates measures to conserve SAR and OG resources, such as a recommendation for a measurable or verifiable strategy for the recruitment of old forest on Quadra Island in September 2024. The most recent appeal decision was in 2023 and was in response to a public request on the Okanagan Shuswap District Manager's 2023 approval of amendments to BC Timber Sales' Forest Stewardship Plan (FSP) for the Okanagan-Columbia area. The amendments addressed a 2021 oversight where the FSP failed to include strategies for the Rose Swanson Mountain sensitive area. After determining the updated strategies aligned with the area's objectives, the Board chose not to appeal the decision.

The BC Provincial Government's Old Growth Forest Stewardship policies page was last updated 4 December 2024.

IFL: 73% of BC's forest are certified. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

Review of the Global Forest Watch IFL layer confirms that the most recent complete dataset cover the 2016-2020 period.

Private Managed Forest Land/ Other Private Land

2025: Review of provincial websites for updates to the State of the Forest Reports confirms that the most recent report is from 2010.

The next review of monitoring variables will be conducted in 2027.

Country: Canada	
Area/sub-scope:	
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-RRR-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRR-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:	
<u>Crown Land</u> On Crown land for licensees with forest management tenures, there is a comprehensive regulatory framework governing reforestation requirements and limited conversion to non-forest use. The Forest Planning and Practices Regulation sets measurable practice requirements. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Results verify compliance with reforestation requirements. On Crown land for the industry sectors that do not have forest management type tenures, legislation does not restrict land conversion. Due to a lack of evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land in British Columbia. <u>Private Managed Forest Land and Other Private Land</u> Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land and other private land in British Columbia.	
Mitigation measure:	
Per review if the FSC Canada NRA, Douglas-fir is more likely to be sourced from reconciliation units 41 and 42, which has a deforestation rate between 0.00-0.02%. Gilani and Innes (2020) in <i>The State of British Columbia's Forests: A Global Comparison</i>, state that the "extent of deforestation is small (0.01%) relative to the total area of forest in the province (54.4 million ha). An estimated 60% of deforestation in British Columbia occurs on crown land and 40% on private land." Moreover, "The main drivers of deforestation in B.C. are agricultural expansion, urban expansion and settlement, infrastructure development associated with oil and gas extraction, forestry, industry, and transportation." The organization's supplier agreements require that feedstock not be sourced from conversion sources. Low risk is confirmed through supplier agreements and the low rate of deforestation in the province.	
Monitoring and outcomes:	
% Signed supplier agreements from suppliers who source from British Columbia. 2025: 100% The next review of monitoring variables will be conducted in 2027.	

Country: Canada	
Area/sub-scope:	
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:	
<u>Other Private Land</u> Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current conditions of variables subject to these indicators, a precautionary approach is applied. As such, these indicators are designated as specified risk for other private land in British Columbia. 2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced. 2.2.3 Soil quality in the Supply Base shall be maintained or enhanced. 2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced. 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. 2.2.10 Harvested areas shall be regenerated.	
Mitigation measure:	
There is a regulatory framework for Non-Enrolled Private Forest Land in British Columbia. For example, there are Local Government Authorities that can regulate landowners outside of PMFLA. These landowners must comply with municipal or regional district bylaws related to land use zoning, tree cutting permits, and development restrictions. This contrasts with PMFLA lands, where local governments cannot restrict forest management activities (see PMLA FAQ 2020). For example, 58 of 162 BC municipalities have tree protection bylaws. Zoning bylaws also permit local governments certain land uses in designative	

zones.

All private landowners are subject to the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Wildlife Act, Wildfire Act, Assessment Act, and the federal Migratory Birds Convention Act, Fisheries Act and Species at Risk Act. Legal violations under these acts can be due to soil and water conditions. Refer to other information cited in the Background section in indicator 2.1.3.

90% of the province's harvest is regulated under a government-set annual allowable cut. Most of this is on Crown Land. Over the last 10 years, the amount of timber harvested annually on public land has been below the Allowable Annual Cut (AAC). The average Allowable Annual Cut was 83 million cubic meters per year and the average harvest on these areas was 67 million cubic meters per year.

The rest of BC's harvest (10%) is from private lands, some of which are enrolled in the Private Managed Forest Land program (PMFL), which includes the establishment of an AAC. While not included in the "Other Private Land" category in the SBP RRA for British Columbia. It is important to note that a portion of Woodlot Licences may include adjacent private lands that are not enrolled in PMFL and are still subject AAC regulations. Nevertheless, the RRA considers Woodlot Licences under the purview of Crown Lands and does not directly address how any private land portions of Woodlot Licences were considered. Per data included in the RRA, Other Private Land is 27% of the province's private land designation. All private land in the province is roughly 0.05% of the total provincial area.

Per review if the FSC Canada NRA, Douglas-fir is more likely to be sourced from reconciliation units 41 and 42, which has a deforestation rate between 0.00-0.02%.

Gilani and Innes (2020) in *The State of British Columbia's Forests: A Global Comparison*, state that the "extent of deforestation is small (0.01%) relative to the total area of forest in the province (54.4 million ha). An estimated 60% of deforestation in British Columbia occurs on crown land and 40% on private land." Moreover, "The main drivers of deforestation in B.C. are agricultural expansion, urban expansion and settlement, infrastructure development associated with oil and gas extraction, forestry, industry, and transportation."

Lake, H. (2024) in *Motivations for Alternative Silviculture-Interviews with forestry professionals on historic partial harvesting practices to support reshaping the status quo in British Columbia* visited woodland owners in interior British Columbia that had representative examples of thinning, single-tree and small-group selection silviculture at a very small scale, species thinnings, improvement thinnings, shelterwood thinnings, young-stand spacing trails, and commercial thinning in second-growth stands. Some of these were from government-led thinning trials of the 1960s. For decades, silviculture in BC has been dominated by clearcut and clearcut-with-reserves silvicultural treatments with no intermediate thinning between final harvest. Small landowners also tend to invest in regeneration success. Lake confirmed in interviews that there is interest in alternative silvicultural regimes among private woodland owners, which favor continuous forest cover or multiple age classes.

Douglas-fir-dominated forests are among the most productive temperate forests in North America. The species is infrequent on poor productivity sites. It is also a highly valued commercial species, which can incentivize measures to keep it growing on the landscape in the absence of competing land uses.

Most recently, the threats to Douglas-fir productivity have been bark beetle outbreaks, for which the

province has prepared guidance for private landowners. Forest management, especially the selection of healthy trees during thinnings or selective harvesting, can be compatible with a bark beetle management strategy. **Low risk** is confirmed due to the commercial desirability of Douglas-fir and that it requires moderate to higher quality sites to thrive and produce the timber grades required by our suppliers AND that the relative impact of the Other Private Land category to the province's managed forests and the organization's feedstock supply are low.

Mitigation measures only include periodic review of literature for information on private forestland management practices in British Columbia. This is because it was found that a regulatory framework for soil, water, and elements of ecosystem health are enforced via NROS and other legal avenues cited in the Background section in indicator 2.1.3, thus confirming **low risk**.

Monitoring and outcomes:

2025: Lake, H. (2024) was reviewed and found to support measures to achieve sustainable harvest levels and regeneration on Other Private Lands. The next literature review will be conducted in 2027.

Country: Canada

Area/sub-scope:

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:

Other Private Land

Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current conditions of variables subject to these indicators, a precautionary approach is applied. As such, these indicators are designated as specified risk for other private land in

British Columbia.

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

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

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

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.

2.2.10 Harvested areas shall be regenerated.

Mitigation measure:

There is a regulatory framework for Non-Enrolled Private Forest Land in British Columbia. For example, there are Local Government Authorities that can regulate landowners outside of PMFLA. These landowners must comply with municipal or regional district bylaws related to land use zoning, tree cutting permits, and development restrictions. This contrasts with PMFLA lands, where local governments cannot restrict forest management activities (see PMLA FAQ 2020). For example, 58 of 162 BC municipalities have tree protection bylaws. Zoning bylaws also permit local governments certain land uses in designative zones.

All private landowners are subject to the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Wildlife Act, Wildfire Act, Assessment Act, and the federal Migratory Birds Convention Act, Fisheries Act and Species at Risk Act. Legal violations under these acts can be due to soil and water conditions. Refer to other information cited in the Background section in indicator 2.1.3.

90% of the province's harvest is regulated under a government-set annual allowable cut. Most of this is on Crown Land. Over the last 10 years, the amount of timber harvested annually on public land has been below the Allowable Annual Cut (AAC). The average Allowable Annual Cut was 83 million cubic meters per year and the average harvest on these areas was 67 million cubic meters per year.

The rest of BC's harvest (10%) is from private lands, some of which are enrolled in the Private Managed Forest Land program (PMFL), which includes the establishment of an AAC. While not included in the "Other Private Land" category in the SBP RRA for British Columbia. It is important to note that a portion of Woodlot Licences may include adjacent private lands that are not enrolled in PMFL and are still subject AAC regulations. Nevertheless, the RRA considers Woodlot Licences under the purview of Crown Lands and does not directly address how any private land portions of Woodlot Licences were considered. Per data included in the RRA, Other Private Land is 27% of the province's private land designation. All private land in the province is roughly 0.05% of the total provincial area.

Per review if the FSC Canada NRA, Douglas-fir is more likely to be sourced from reconciliation units 41 and 42, which has a deforestation rate between 0.00-0.02%.

Gilani and Innes (2020) in *The State of British Columbia's Forests: A Global Comparison*, state that the "extent of deforestation is small (0.01%) relative to the total area of forest in the province (54.4 million ha). An estimated 60% of deforestation in British Columbia occurs on crown land and 40% on private land." Moreover, "The main drivers of deforestation in B.C. are agricultural expansion, urban expansion and

settlement, infrastructure development associated with oil and gas extraction, forestry, industry, and transportation.”

Lake, H. (2024) in *Motivations for Alternative Silviculture-Interviews with forestry professionals on historic partial harvesting practices to support reshaping the status quo in British Columbia* visited woodland owners in interior British Columbia that had representative examples of thinning, single-tree and small-group selection silviculture at a very small scale, species thinnings, improvement thinnings, shelterwood thinnings, young-stand spacing trails, and commercial thinning in second-growth stands. Some of these were from government-led thinning trials of the 1960s. For decades, silviculture in BC has been dominated by clearcut and clearcut-with-reserves silvicultural treatments with no intermediate thinning between final harvest. Small landowners also tend to invest in regeneration success. Lake confirmed in interviews that there is interest in alternative silvicultural regimes among private woodland owners, which favor continuous forest cover or multiple age classes.

Douglas-fir-dominated forests are among the most productive temperate forests in North America. The species is infrequent on poor productivity sites. It is also a highly valued commercial species, which can incentivize measures to keep it growing on the landscape in the absence of competing land uses.

Most recently, the threats to Douglas-fir productivity have been bark beetle outbreaks, for which the province has prepared guidance for private landowners. Forest management, especially the selection of healthy trees during thinnings or selective harvesting, can be compatible with a bark beetle management strategy. **Low risk** is confirmed due to the commercial desirability of Douglas-fir and that it requires moderate to higher quality sites to thrive and produce the timber grades required by our suppliers AND that the relative impact of the Other Private Land category to the province’s managed forests and the organization’s feedstock supply are low.

Mitigation measures only include periodic review of literature for information on private forestland management practices in British Columbia. This is because it was found that a regulatory framework for soil, water, and elements of ecosystem health are enforced via NROS and other legal avenues cited in the Background section in indicator 2.1.3, thus confirming **low risk**.

Monitoring and outcomes:

2025: Lake, H. (2024) was reviewed and found to support measures to achieve sustainable harvest levels and regeneration on Other Private Lands. The next literature review will be conducted in 2027.

Country: Canada

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
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- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
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- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☒ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
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- ☐ 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:

Other Private Land

Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current conditions of variables subject to these indicators, a precautionary approach is applied. As such, these indicators are designated as specified risk for other private land in British Columbia.

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

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

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

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.

2.2.10 Harvested areas shall be regenerated.

Mitigation measure:

There is a regulatory framework for Non-Enrolled Private Forest Land in British Columbia. For example, there are Local Government Authorities that can regulate landowners outside of PMFLA. These landowners must comply with municipal or regional district bylaws related to land use zoning, tree cutting permits, and development restrictions. This contrasts with PMFLA lands, where local governments cannot restrict forest management activities (see PMLA FAQ 2020). For example, 58 of 162 BC municipalities have tree protection bylaws. Zoning bylaws also permit local governments certain land uses in designative zones.

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below the Allowable Annual Cut (AAC). The average Allowable Annual Cut was 83 million cubic meters per year and the average harvest on these areas was 67 million cubic meters per year.

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Most recently, the threats to Douglas-fir productivity have been bark beetle outbreaks, for which the province has prepared guidance for private landowners. Forest management, especially the selection of healthy trees during thinnings or selective harvesting, can be compatible with a bark beetle management strategy. **Low risk** is confirmed due to the commercial desirability of Douglas-fir and that it requires moderate to higher quality sites to thrive and produce the timber grades required by our suppliers AND that the relative impact of the Other Private Land category to the province's managed forests and the organization's feedstock supply are low.

Mitigation measures only include periodic review of literature for information on private forestland management practices in British Columbia. This is because it was found that a regulatory framework for soil, water, and elements of ecosystem health are enforced via NROS and other legal avenues cited in the

Background section in indicator 2.1.3, thus confirming **low risk**.

Monitoring and outcomes:

2025: Lake, H. (2024) was reviewed and found to support measures to achieve sustainable harvest levels and regeneration on Other Private Lands. The next literature review will be conducted in 2027.

Country: Canada

Area/sub-scope:

Risk Assessment used:

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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:

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Mitigation measure:

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Mitigation measures only include periodic review of literature for information on private forestland management practices in British Columbia. This is because it was found that a regulatory framework for soil, water, and elements of ecosystem health are enforced via NROS and other legal avenues cited in the Background section in indicator 2.1.3, thus confirming **low risk**.

Monitoring and outcomes:

2025: Lake, H. (2024) was reviewed and found to support measures to achieve sustainable harvest levels and regeneration on Other Private Lands. The next literature review will be conducted in 2027.

Country: Canada

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
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- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:
2.2.10 Harvested areas shall be regenerated
Description of the specific risk:
<u>Other Private Land</u> Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current conditions of variables subject to these indicators, a precautionary approach is applied. As such, these indicators are designated as specified risk for other private land in British Columbia. 2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced. 2.2.3 Soil quality in the Supply Base shall be maintained or enhanced. 2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced. 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. 2.2.10 Harvested areas shall be regenerated.
Mitigation measure:
There is a regulatory framework for Non-Enrolled Private Forest Land in British Columbia. For example, there are Local Government Authorities that can regulate landowners outside of PMFLA. These landowners must comply with municipal or regional district bylaws related to land use zoning, tree cutting permits, and development restrictions. This contrasts with PMFLA lands, where local governments cannot restrict forest management activities (see PMLA FAQ 2020). For example, 58 of 162 BC municipalities have tree protection bylaws. Zoning bylaws also permit local governments certain land uses in designative zones. <i>All private landowners</i> are subject to the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Wildlife Act, Wildfire Act, Assessment Act, and the federal Migratory Birds Convention Act, Fisheries Act and Species at Risk Act. Legal violations under these acts can be due to soil and water conditions. Refer to other information cited in the Background section in indicator 2.1.3. 90% of the province's harvest is regulated under a government-set annual allowable cut. Most of this is on Crown Land. Over the last 10 years, the amount of timber harvested annually on public land has been below the Allowable Annual Cut (AAC). The average Allowable Annual Cut was 83 million cubic meters per year and the average harvest on these areas was 67 million cubic meters per year. The rest of BC's harvest (10%) is from private lands, some of which are enrolled in the Private Managed Forest Land program (PMFL), which includes the establishment of an AAC. While not included in the "Other Private Land" category in the SBP RRA for British Columbia. It is important to note that a portion of Woodlot Licences may include adjacent private lands that are not enrolled in PMFL and are still subject AAC regulations. Nevertheless, the RRA considers Woodlot Licences under the purview of Crown Lands and does not directly address how any private land portions of Woodlot Licences were considered. Per data included in the RRA, Other Private Land is 27% of the province's private land designation. All private

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Mitigation measures only include periodic review of literature for information on private forestland management practices in British Columbia. This is because it was found that a regulatory framework for soil, water, and elements of ecosystem health are enforced via NROS and other legal avenues cited in the Background section in indicator 2.1.3, thus confirming **low risk**.

Monitoring and outcomes:

2025: Lake, H. (2024) was reviewed and found to support measures to achieve sustainable harvest levels and regeneration on Other Private Lands. The next literature review will be conducted in 2027.

Country: Canada	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☒ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	
Description of the specific risk:	
As other private land in BC is owned by individuals or small businesses, there is no requirement to be WorkSafeBC registered. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results to verify safeguards are in place to protect the health and safety of workers, this Indicator is designated as specified risk for other private land in British Columbia.	
Mitigation measure:	
In British Columbia, sole proprietors are covered under the Workers Compensation Act and the Occupational Health and Safety (OHS) Regulation, both enforced by WorkSafeBC. While not legally obligated to have WorkSafeBC insurance coverage unless they hire workers, sole proprietors are still required to follow the same health and safety standards as employers. Core safety duties for sole proprietors Include key responsibilities to protect their own health and safety, as well as the safety of others who may be affected by their work. These duties include: · Following all safety laws: Comply with all applicable parts of the OHS Regulation related to your specific work activities, whether sole proprietors work alone or with a crew. · Identifying hazards: Before beginning work, they must identify any potential hazards related to the task or worksite. · Eliminating and controlling hazards: Take reasonable precautions to eliminate or minimize risks from identified hazards. If a hazard cannot be eliminated, they must take steps to minimize the danger. · Using proper protective equipment: Wear all necessary personal protective equipment (PPE) as required by the regulations.	

- **Ensuring proper equipment:** Maintain tools and equipment to ensure that these are in a safe condition for use.
- **Complying with hazardous product rules:** Follow all regulations for working with hazardous products, including receiving any required WHMIS training.
- **Cooperating on multi-employer worksites:** If sole proprietors are contracted by another company, they must cooperate with that company's health and safety committee and follow any specific workplace safety rules. The employer is responsible for communicating any known hazards to sole proprietors.
- **Reporting incidents:** Immediately report work-related incidents, such as serious injuries or dangerous occurrences, to WorkSafeBC.

While safety rules apply to all self-employed individuals, WorkSafeBC coverage is not mandatory *unless a sole proprietor hires employees*.

- **Mandatory for employers:** If sole proprietors hire any workers or unregistered subcontractors, they are legally required to register with WorkSafeBC.
- **Optional for personal protection:** Sole proprietors without employees can purchase optional Personal Optional Protection (POP) insurance via WorkSafeBC. This provides income replacement benefits if a self-employed person gets injured on the job.

WorkSafeBC publishes the results of its investigations, penalties, and injunctions publicly. A review of investigation reports shows forest work-related reports for two incidents in 2022 and 2023. No penalties or injunctions related to forest industries.

Other important information

- **WorkSafeBC website:** The official WorkSafeBC site includes resources on regulations, guides, and specific industry information.
 - **Occupational Health and Safety Regulation** was last amended 31 March 2025 and includes regulations for forestry, logging, and related industries.
 - **Canadian Centre for Occupational Health and Safety (CCOHS):** This organization provides introductory resources for small and micro-businesses on health and safety best practices.
- Sources: WorkSafe BC, BC Health & Safety Laws, Canadian Centre For Occupational Health & Safety, BC Safety Standards Act, and Health & Safety for Small Businesses

Low risk is confirmed through evidence of enforcement of the legal framework, and FSC/PEFC/SFI certification systems in the sourcing area. FSC, PEFC, and SFI have health and safety requirements that extend to forest contractors and the forest products industry. SFI sponsors forester and logger education and training in British Columbia; refer to <https://wcsic.ca/> for more information. Over 70% of the forestland base in BC has forest management certification as previously mentioned. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

We will periodically review the WorkSafeBC investigations on WorkSafeBC website for forestry-related incidents and monitor statistics on certified forestland as stated in other indicators.

Monitoring and outcomes:

2025: 73% of BC's forest are certified.

A review of investigation reports shows forest work-related reports for two incidents in 2022 and 2023. No penalties or injunctions related to forest industries.

The next review will be conducted in 2027.

Country: Canada	
Area/sub-scope:	
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:	
<u>Private Managed Forest Land</u> Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land in British Columbia. <u>Other Private Land</u> Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia.	
Mitigation measure:	
On Private Managed Forest Land (PMFL) in British Columbia, the regulatory framework primarily focuses on environmental values, but there are limited formal requirements that directly identify or mitigate negative social and community impacts. However, several mechanisms and concerns touch on these issues:	

◆ Key Environmental Objectives with Indirect Social Relevance

According to the Managed Forest Council, under the Private Managed Forest Land Act, landowners must manage for five key public environmental values:

1. Soil conservation
2. Water quality
3. Fish habitat
4. Critical wildlife habitat
5. Reforestation

While these are ecological in nature, they indirectly address social concerns, especially where community drinking water, fisheries, or wildlife viewing are affected.

◆ Community and Local Government Concerns

Per a recent example from the Association of Vancouver Island and Coastal Communities (AVICC), local governments and community organizations have repeatedly raised concerns about:

- Lack of consultation before harvesting.
- Impacts on watersheds, drinking water, and infrastructure.
- Visual quality and recreation values near communities.

These concerns have led to resolutions by the Union of BC Municipalities (UBCM) and the Association of Vancouver Island and Coastal Communities (AVICC) calling for:

- Stronger regulations.
- Mandatory community engagement.
- Alignment with Crown land standards.

Program Review and Public Engagement

The BC government conducted a **review of the PMFL Program** using public engagement through surveys and written submissions and consultation with communities, Indigenous Nations, and stakeholders. The resulting report (2019) shows that most respondents are from areas with highest concentration of lands enrolled in PMFL, mainly Vancouver Island and the Kootenay region. Most respondents (72%) reported they do not feel informed of forestry activities that may occur on Private Managed Forest Land in their community. Nearly two thirds of respondents (62%) disagreed that the key public environmental values specified in the PMFL are sufficient. Most (70%) of respondents disagreed that the current regulatory framework is effective in supporting achievement of the management objectives specified in the PMFL Act have occurred on PMFL in their community.

While this high-level program review identified negative social and community impacts, it does not include evidence of specific actions taken yet to address concerns.

The University of Victoria's Environmental Law Centre published a report (2019) on key areas in need of reform in the PMFL program. PMFL landowners are exempt from local government bylaws that might otherwise regulate forest practices. There are no explicit requirements to assess or mitigate social impacts such as noise, traffic, or cultural site disturbance. Indigenous Nations have raised concerns about exclusion from decision-making and loss of access to culturally significant lands.

While the PMFL program includes environmental protections that can benefit communities, it lacks direct regulatory mechanisms to identify or mitigate negative social and community impacts. Ongoing reviews and advocacy efforts aim to address these gaps through improved governance, consultation, and policy reform.

While not included in the "Other Private Land" category in the SBP RRA for British Columbia. It is important to note that a portion of Woodlot Licences may include adjacent private lands that are not enrolled in PMFL. Nevertheless, the RRA considers Woodlot Licences under the purview of Crown Lands and does not directly address how any private land portions of Woodlot Licences were considered. Per review of the Woodlot Licence program, public consultation is required prior to approval of a Woodlot

Licence Plan.

Per data included in the RRA, Other Private Land is 27% of the province's private land designation. All private land in the province is roughly 0.05% of the total provincial area.

As mentioned in other indicators, all private lands in the province are subject to laws intended to address some negative social impacts related to drinking water, water and soil quality, wildlife, and others. Per review of the 2019 provincial report on the PMFL program, many of the social impact concerns over the program relate to drinking water and other environmental values, which are addressed in the legal framework and enforced by regulatory authorities as stated in other indicators. That is, there is a legislative framework and evidence to support implementation mechanism and monitoring framework for these environmental values associated with negative social impacts.

Given our suppliers' position in the supply chain (i.e., foreign buyers of secondary forest products) and that most of the forest products purchased are likely to be from Crown Lands due to these composing 95% of the forest land base, we have defined mitigation measures commensurate with the scale and intensity of our operations (i.e., <1% of feedstock comes from British Columbia).

Third-party certification programs require the identification and mitigation of negative social impacts. **Low risk** can be confirmed via verification of the percentage of the sourcing area that is certified to recognized forest management certifications (e.g., FSC, SFI, CSA, etc.) and/or periodic review of the updates to the BC Provincial Government's policies related to private forestland management. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

Monitoring and outcomes:

2025: 73% of BC's forest are certified. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

A review of the BC Laws site confirmed that there was a minor update to the law in 2024 that does not affect the subject of this indicator. A review of the BC Laws site does not reveal any significant updates that would affect Other Private Land's conformance.

The next review will be conducted in 2027.

Country: Canada

Area/sub-scope:

Risk Assessment used:

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

	☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☒ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.2.3 Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced	
Description of the specific risk:	
<u>Other Private Land</u> There are provincial legislative requirements for the protection of human drinking water on other private land. However, there is no publicly available information describing implementation mechanisms, a monitoring framework, and/or results of the current condition for the protection of human drinking water. Due to a lack of evidence, a precautionary approach is applied, and this Indicator is designated as specified risk for other private land in British Columbia.	
Mitigation measure:	
According to the provincial government, approximately 95% of its timber is publicly owned (Crown Land). The BC government authorizes the rights to harvest Crown timber through forest tenures. Approximately 5% of the province's timber occurs on private forestlands. Of these, roughly half are enrolled in the province's Private Managed Forest Land Program (PMFLP). Private timber marks are required to transport logs from privately-owned land and are administered by the BC government. Landowners who are not part of PMFLP, or who do not have their private land in a Forest Act license, are required to follow local government by-laws on their property. <i>All private landowners</i> are subject to the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Wildlife Act, Wildfire Act, Assessment Act, and the federal Migratory Birds Convention Act, Fisheries Act and Species at Risk Act. Under Canadian law, any citizen can initiate a private prosecution for a criminal or regulatory offense if they believe one has occurred. So, citizens in British Columbia can allege noncompliance with environmental laws, though their options are different from those of government regulators. Citizens can report infractions to authorities, and in some cases, initiate a private prosecution. The specific legal and procedural avenues for doing so depend on the type of law and the party involved. For most provincial statutes, enforcement is handled by a government body or regulator, while specific laws may grant a private right of action for citizens to sue. Web searches confirm examples of citizens that have sought legal action against forest managers for legal violations: · Haida Gwaii logging claim (2025): In April 2025, the B.C. Supreme Court ruled against a C\$75 million compensation claim by Teal Jones, a forestry company, over the protection of old-growth forests on	

Haida Gwaii.

Web searches confirm that the Forest Appeals Commission (FAC) includes rulings on regulatory enforcement on Crown and Private lands:

- <https://www.bcfac.ca/act/private-managed-forest-land-act/>
- <https://www.bcfac.ca/act/wildfire-act/>
- <https://www.bcfac.ca/act/forest-practices-code-of-british-columbia-act/>

Of note, a 2025 FAC ruling punishes a timber company for violations of old growth protection rules per the Forest And Range Practices Act that occurred between 2012-2016.

Web searches confirm that the Environmental Appeals Commission (EAC) includes rulings on regulatory enforcement on Crown and Private lands:

- <https://www.bceab.ca/act/water-sustainability-act/>
- <https://www.bceab.ca/act/wildlife-act/>

Of notice, a 2025 EAC ruling against a cattle and timber producer for unauthorized works in violation of the Water Sustainability Act.

The Natural Resource Officer Service (NROS) can investigate legal violations involving Crown and Private lands, including enforcement of the Forest Act, Range Act, Wildfire Act, Forest and Range Practices Act, Land Act, Water Sustainability Act, and Heritage Conservation Act. NROS prepares annual reports summarizing the results of its activities.

Low risk can be confirmed via verification of the percentage of the sourcing area that is certified to recognized forest management certifications (e.g., FSC, SFI, CSA, etc.) and/or periodic review of updates to the BC Provincial government's laws related to drinking water and hunting/fishing laws on private lands. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

Monitoring and outcomes:

2025: 73% of BC's forest are certified. Evidence from our suppliers indicates that all of their suppliers carry PEFC and/or SFI certification. Processing residues sourced from PEFC and SFI certificates are considered low risk by SBP.

A review of the BC Laws site confirmed no significant updates to drinking water or hunting/fishing laws on private land.

The next review will be conducted in 2027.

Country: Canada

Area/sub-scope:

Risk Assessment used:

☐ SBP-RRR-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:	
<u>Private Managed Forest Land</u> <u>Other Private Land</u> A legal framework exists in BC to identify, document, and respect traditional tenure and use rights of Indigenous Peoples. The BC government has passed DRIPA, has a Declaration Act Action Plan, and works collaboratively with Indigenous leadership. There are Consultation and Revenue Sharing Agreements that identify consultation processes. There are a range of programs to advance First Nations participation in forestry and forest management. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. Indigenous Peoples have not asserted tenure and use rights on private managed forest land and other private land. As such, this Indicator is designated as specified risk on private managed forest land and other private land in British Columbia.	
Mitigation measure:	
For non-primary producers, the FSC Canada NRA allows for a dispute resolution process to be established specifically to address issues arising from violations of the right of Indigenous People related to forest management activities. In BC, there are dispute mechanisms available to Indigenous Peoples regarding claims over tenure and use rights and FPIC, which are detailed in 4.2.4 and 4.2.6. Examples include Environmental Assessment Dispute Resolution per the Environmental Assessment Act (EAA) and the BC Treaty Commission. We have reviewed provincial websites for disputes of substantial magnitude in the supply area that may affect our feedstock. Per review of the EAA Dispute Resolution page and annual reports on the Declaration on the Rights of Indigenous Peoples Act, there are no disputes that adversely affect the ability to conduct forest management on private lands currently. In the event of a dispute of substantial magnitude, we will first verify that Indigenous Peoples use	

provincially available dispute processes by review of the EAA Dispute Resolution page and annual reports on the Declaration on the Rights of Indigenous Peoples Act (DRIPA) websites.

Other evidence also demonstrates that Indigenous Peoples regularly use the provincial and federal judicial system to address their disputes over private land tenures, the most recent being the Cowichan Tribes case, where a BC Supreme Court ruling declared Aboriginal title over land that includes private property.

Key aspects of the ruling and its impact

- **Precedent-setting decision:** This is the first time a court has recognized Aboriginal title over land that includes privately owned, fee simple land.
- **Status of private land:** The court found that some fee simple grants of private land are "unjustifiable infringements" on Aboriginal title. This means that fee simple title is not superior and can be challenged.
- **Current uncertainty:** The ruling has created uncertainty for landowners, with some receiving letters from the city of Richmond warning that their ownership status could be compromised.
- **First Nation's position:** The Cowichan Tribes have stated that they do not intend to evict private homeowners and are focused on negotiating a solution.
- **Appeals:** The City of Richmond is appealing the decision, primarily to defend the validity of private property rights

Note that this dispute does not involve any forest management tenures and thus does not currently affect any private forest management.

Low risk is confirmed via the following mitigation measure: review of publicly available information in the supply base that demonstrates that there are no disputes of substantial magnitude and that dispute mechanisms are available and used,

Monitoring and outcomes:

2025: Refer to evidence cited in the mitigation measure column. There are no disputes of substantial magnitude against private forest management in the province.
The next review will be conducted in 2027.

Country: Canada

Area/sub-scope:

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:	
<u>Private Managed Forest Land</u> <u>Other Private Land</u> In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), The BC Declaration of the Rights of Indigenous Peoples Act (DRIPA) and the principles of the Reconciliation Strategy, the Government recognizes the right of Indigenous Peoples to participate in decision-making on matters that affect their rights, through their own representative institutions. It also acknowledges the obligation to consult and cooperate in good faith with the aim of securing their free, prior, and informed consent (FPIC). The importance of FPIC, as outlined in the UN Declaration, extends beyond titled lands and encompasses broader issues related to Indigenous rights, governance, and stewardship responsibilities. Therefore, this Indicator is designated as Low risk for Crown land in British Columbia. In addition, Indigenous Peoples have not asserted tenure and use rights on private land. As such, this Indicator is also designated as specified risk for private land in British Columbia	
Mitigation measure:	
For non-primary producers, the FSC Canada NRA allows for a dispute resolution process to be established specifically to address issues arising from violations of the right of Indigenous People related to forest management activities. In BC, there are dispute mechanisms available to Indigenous Peoples regarding claims over tenure and use rights and FPIC, which are detailed in 4.2.4 and 4.2.6. Examples include Environmental Assessment Dispute Resolution per the Environmental Assessment Act (EAA) and the BC Treaty Commission. We have reviewed provincial websites for disputes of substantial magnitude in the supply area that may affect our feedstock. Per review of the EAA Dispute Resolution page and annual reports on the Declaration on the Rights of Indigenous Peoples Act, there are no disputes that adversely affect the ability to conduct forest management on private lands currently. In the event of a dispute of substantial magnitude, we will first verify that Indigenous Peoples use provincially available dispute processes by review of the EAA Dispute Resolution page and annual reports on the Declaration on the Rights of Indigenous Peoples Act (DRIPA) websites. Other evidence also demonstrates that Indigenous Peoples regularly use the provincial and federal judicial system to address their disputes over private land tenures, the most recent being the Cowichan Tribes case, where a BC Supreme Court ruling declared Aboriginal title over land that includes private property.	

Key aspects of the ruling and its impact

- **Precedent-setting decision:** This is the first time a court has recognized Aboriginal title over land that includes privately owned, fee simple land.
- **Status of private land:** The court found that some fee simple grants of private land are "unjustifiable infringements" on Aboriginal title. This means that fee simple title is not superior and can be challenged.
- **Current uncertainty:** The ruling has created uncertainty for landowners, with some receiving letters from the city of Richmond warning that their ownership status could be compromised.
- **First Nation's position:** The Cowichan Tribes have stated that they do not intend to evict private homeowners and are focused on negotiating a solution.
- **Appeals:** The City of Richmond is appealing the decision, primarily to defend the validity of private property rights

Note that this dispute does not involve any forest management tenures and thus does not currently affect any private forest management.

Low risk is confirmed via the following mitigation measure: review of publicly available information in the supply base that demonstrates that there are no disputes of substantial magnitude and that dispute mechanisms are available and used,

Monitoring and outcomes:

2025: Refer to evidence cited in the mitigation measure column. There are no disputes of substantial magnitude against private forest management in the province.
The next review will be conducted in 2027.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 16 Sep 2025

Biomass Producer's stakeholder engagement end date:

Total number of stakeholders contacted: 16

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

Stakeholders were primarily contacted via email. Stakeholder groups contacted include regional economic, social, regulatory, tribal, and environmental interests.

4.2 Response to stakeholder comments

Stakeholder description: None received.

Stakeholder comment: N/A

Response to the stakeholder: N/A

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Tony Woods
Title	Management representative
Date of report approval	28 Oct 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

United States California, Oregon, and Washington	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification; Evaluation of the Programme for the Endorsement of Forest Certification (PEFC™) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification (hereafter referred to as SBP FSC and PEFC benchmarking); organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 1 – Illegally Harvested Wood. (Refer to section 1.1 Land tenure and management rights of the NRA for justification and explanation of the rationale for a low-risk conclusion). The organization's sourcing procedures and supplier contracts/agreements and risk assessments ensure compliance. SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes equivalency to this indicator for processing residues. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Supplier agreements and risk assessments confirm that each supplier sources material from within the supply base and is thus subject to certain federal and state legal requirements. The organization consults laws and regulations as necessary. Examples of resources available online include: • California Forest Practice Rules (https://www.fire.ca.gov/what-we-do/natural-resource-management/forest-practice) • Oregon Forest Practices Act (https://www.oregon.gov/odf/working/pages/fpa.aspx). • Washington Forest Practice Rules (https://app.leg.wa.gov/wac/default.aspx?cite=222). • Timber Assurance (https://www.stateforesters.org/timber-assurance). • National Timber Tax Website (https://www.timbertax.org). • Cornell Law School Legal Information Institute (https://www.law.cornell.edu/)
Risk Rating	Low Risk

United States California, Oregon, and	Indicator
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Washington	
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and risk assessments.
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 1 – Illegally Harvested Wood. (Refer to section 1.1 Land tenure and management rights of the NRA for justification and explanation of the rationale for a low-risk conclusion). SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes equivalency to this indicator for processing residues. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Supplier agreements require that laws related to ownership and resource use rights are respected. Supplier risk assessments demonstrate that feedstock is sourced from within the SB and subject to relevant laws of these jurisdictions.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); CITES list on Species+; SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and risk assessments and risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 1 – Illegally Harvested Wood. (Refer to section 1.1 Land tenure and management rights of the NRA for justification and explanation of the rationale for a low-risk conclusion). SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes equivalency to this indicator for processing residues. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Per review of sourcing area maps, supplier risk assessments and agreements, the organization does not import feedstock or use CITES-listed species per review of information on https://www.speciesplus.net/ . The only species sourced is <i>Pseudotsuga menziesii</i> (Douglas-fir).
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 1 – Illegally Harvested Wood. (Refer to section 1.5 Payment of royalties and harvesting fees of the NRA for justification and explanation of the rational for a low-risk conclusion). SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes partial equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The FSC-US NRA bases its conclusion on federal and state laws, which are regularly enforced. Supplier agreements require that laws related to legally prescribed payments are respected. Supplier risk assessments demonstrate that feedstock is sourced from within the SB and subject to relevant laws of these jurisdictions.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 1 – Illegally Harvested Wood. (Refer to section 1.21 Legislation requiring due diligence/due care procedures of the NRA for justification and explanation of the rational for a low-risk conclusion). SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes equivalency to this indicator for processing residues. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Supplier agreements require compliance to legal requirements.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has identified HCVs with specified risks for HCV Categories 1 (Species Diversity) and 3 (Rare Ecosystems) (Refer to the FSC-US NRA for justification and explanation of the rationale for the low-risk conclusion). Threats to HCVs from forest management activities are identified in the FSC-US NRA. SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes partial equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization's SBP sourcing policies & procedures ensure low risk to this indicator. Supplier agreements require compliance to laws related to HCVs. Risk assessments ensure identification of sourcing areas to at least the state and county, and thus the HCVs identified in the FSC-US National Risk Assessment. Summary of FSC-US risk HCV1/HCV3 conclusions by state (Note that these are applicable at the county-level, meaning that the Supply Base may include counties that are outside of the specified risk zone): Oregon and select counties of California HCV 1 – Klamath Siskiyou CBA HCV 3 – Old growth Washington HCV 3 – Old growth
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); SFI Implementation Committee (SIC) meeting minutes and/or evidence of support/participation; supplier

	contracts/agreements and risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has identified HCVs with specified risks for HCV Categories 1 (Species Diversity) and 3 (Rare Ecosystems) (Refer to the FSC-US NRA for justification and explanation of the rational for the low-risk conclusion). Threats to HCVs from forest management activities are identified in the FSC-US NRA. SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes partial equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization's SBP sourcing policies & procedures ensure low risk to this indicator. Risk assessments ensure identification of sourcing areas to at least the state and county, and thus the risks to HCVs identified in the FSC-US National Risk Assessment.
Risk Rating	Specified Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has identified HCVs with specified risks for HCV Categories 1 (Species Diversity) and 3 (Rare Ecosystems) (Refer to the FSC-US NRA for justification and explanation of the rational for the low-risk conclusion). Threats to HCVs from forest management activities are identified in the FSC-US NRA. The SBP Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification concludes that FSC and PEFC are equivalent to SBP for this indicator. The organization's SBP sourcing policies & procedures ensure low risk to this indicator. Risk assessments ensure identification of sourcing areas to at least the state and county, and thus the risks to HCVs identified in the FSC-US National Risk Assessment.
Risk Rating	Specified Risk

United States California, Oregon, and Washington	Indicator
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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	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/ agreements; publications cited in finding
Risk Rating justification	FSC-US NRA, V1-0, has concluded specified risk for conversion of forestland to non-forest use for select counties in Oregon and Washington included in the Supply Base. Alig <i>et al.</i> 2003 provide a history of forestland use change from 1952-1997 and projections through 2050 considering conversion rates and suitability. Conversion of forestland to urban uses was the biggest conversion source from 1952-1997 and is likely to continue through 2050 (https://www.fs.usda.gov/pnw/pubs/pnw_gtr587.pdf). While forest management practices may affect the size and function of wetlands and similar ecosystems (e.g., peatlands) in the Pacific Northwest, it alone is unlikely to result in significant loss of wetlands and peatlands (Adamus 2014; Adamus, Paul R. 2014. Effects of forest roads and tree removal in or near wetlands of the Pacific Northwest: a literature synthesis. Cooperative Monitoring Evaluation and Research Report CMER 12-1202. Washington State Forest Practices Adaptive Management Program. Washington Department of Natural Resources, Olympia, WA). Histosols and gelisols are most associated with peatlands. Histosols occur in Oregon and Washington and may be forested. According to Oregon State University, peatland harvesting is a leading cause of peatland loss (https://news.oregonstate.edu/news/harvesting-peat-moss-contributes-climate-change-oregon-state-scientist-says). According to the Global Peatlands Initiative (2024), other important sources of peatland loss in Oregon and Washington are conversion to cranberry bogs (https://globalpeatlands.org/sites/default/files/2024-09/202210_GPA%20The%20State%20of%20the%20World%E2%80%99s%20Peatlands_14%20MAIN_1.pdf). Conversion of peatlands and wetlands is highly regulated in the USA (see indicator 3.2.3) and unlikely to occur within the supply base due to forest management as cited previously. While there are native grasslands in Oregon and Washington, prairies and Oregon white oak savannas on west side of the Cascades and Northern California are threatened from land use conversion, invasive species, and colonization by native conifer species. As such, harvest of native conifers in these areas is often consistent with their maintenance and restoration. Refer to information from the Calapooia Watershed Council (https://www.calapooia.org/what-we-do/oak-savannah-restoration/), South

	Puget Sound Prairies (http://w.southsoundprairies.org/), Oregon Conservation Strategy (https://www.oregonconservationstrategy.org/strategy-habitat/oak-woodlands/), and Klamath Bird Observatory (https://klamathbird.org/uncategorized/restoring-oak-habitats-in-southern-oregon-and-north-california-a-guide-for-private-landowners/) for more information. Specified risk is concluded; however, risk is mitigated via the organization's sourcing system. SBP FSC benchmarking concludes partial equivalency to this indicator. SBP PEFC benchmarking concludes no equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization's sourcing from suppliers with SFI Chain of Custody (COC), Certified Sourcing (CS), and/or Fibre Sourcing (FS) certifications serve as control measures for this indicator. Specifically, SFI FS Objective 11 requires avoidance of controversial sources, including conversion sources originating from regions experiencing forest area decline. There are similar provisions in the SFI Forest Management (FM) and American Tree Farm Standards (ATFS) that are allowed to enter SFI-certified supply chains. SFI FM and ATFS-certified materials from the forest (e.g., logs, in-woods chips) must conform to non-conversion clauses in those standards to be recognized by PEFC. SFI certificate holders must support state SFI Implementation Committees (SIC) that support logger education, Project Learning Tree for teachers and students, regional assessments for Forests with Conservation Value (FECV), and support for programs to keep forests as forests. Supplier agreements require that suppliers not source from known conversion sources. It may be possible at future dates to include suppliers who also carry FSC COC certification. Those who also are certified to FSC Controlled Wood requirements will also meet SBP mitigation measures. Supplier risk assessments require that suppliers declare their states and counties of origin to assess conversion risk.
Risk Rating	Specified Risk

United States California, Oregon, and Washington	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	FSC-US National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0); SBP FSC and PEFC benchmarking; organization's chain of custody and sourcing procedures (e.g., SBP COC procedures, SBP sourcing policies, etc.); supplier contracts/agreements and

	risk assessments
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Categories 1, 2 and 5, and specified risks for Categories 3 and 4 for select counties of Oregon and Washington, and specified risks for Category 3 for select counties in California (Refer to the NRA for justification and explanation of the rationale for conclusions). These Categories and their mitigation measures are already sufficiently covered in other SBP ST 1 indicators. Federal, State, and Tribal BMPs are also used to avoid and control soil and water quality impacts, including to wetland and aquatic ecosystems. Supplier agreements/contracts require adherence to BMPs. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified).
Risk Rating	Specified Risk

United States California, Oregon, and Washington	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Federal laws Publications cited in finding Best management practices (BMPs) State Foresters website SFI/PEFC/FSC COC, CS, and FS certifications Supplier contracts/ agreements SBP FSC and PEFC benchmarking
Risk Rating justification	According to the USDA: "The Soil and Water Resources Conservation Act (RCA) of 1977, as amended, provides the United States Department of Agriculture (USDA) broad strategic assessment and planning authority for the conservation, protection, and enhancement of soil, water, and related natural resources. "Through RCA, USDA: • appraises the status and trends of soil, water, and related resources on non-Federal land and assesses their capability to meet present and future demands; • evaluates current and needed programs, policies, and authorities; and • develops a national soil and water conservation program to give direction to USDA soil and water conservation activities." Source: https://www.nrcs.usda.gov/rca Other relevant laws include the Clean Water Act (CWA), which "establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters." Source: https://www.epa.gov/laws-regulations/summary-clean-water-act

	Most states, including the ones in the Supply Base, have adopted Best Management Practices (BMPs) for forestry, which have their basis in the Federal Water Pollution Control Act (FWPCA) of 1972. BMPs generally are quasi-regulatory; that is, they may become mandatory when violations are detected. Section 319 of the reauthorization of the FWPCA of 1987 required states to report to U.S. Congress on the status and impacts of non-point source pollution BMP include provisions for limiting soil disturbance and stabilizing areas where mineral soil is exposed. Source: R. Cristan et al. National status of state developed and implemented forestry Best Management Practices for protecting water quality in the United States For. Ecol. Manage. (2018) https://doi.org/10.1016/j.foreco.2017.07.002 The National Association of State Foresters (NASF) Website serves as a clearinghouse for state water quality BMP reports (see https://www.stateforesters.org/bmps/). Recently, in 2019, NASF released “Protecting the Nation’s Water: State Forestry Agencies and Best Management Practices,” a national update on the use of BMPs. The report found that over all 50 states that BMPs are implemented at a rate of 92%. BMPs are most critical in and around filter areas such as vegetated areas around waterbodies. Generally, there are two major objectives: • Minimize disturbance of forest floor, especially in filter areas; and • Stabilize areas of exposed soil within filter areas and in other locations where runoff has the potential to reach filter areas (including through use of harvest residues). SBP’s FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization’s suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization requires the use of BMPs in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	BMPs State Foresters website Supplier contracts/ agreements Research publications cited in finding SBP FSC and PEFC benchmarking
Risk Rating justification	The organization procures processing residues that are the byproduct of lumber production (e.g., woodchips, sawdust, and shavings). That is, its

suppliers are not likely to harvest forest residues and/or stumps as a part of conventional operations.

The California Forest Practice Rules require retention of live and dead wood in harvest units and for riparian management zones (<https://www.fire.ca.gov/what-we-do/natural-resource-management/forest-practice>). The Oregon Forest Practices Act requires retention of live and dead wood in harvest units depending on the harvest type and size, and for riparian management zones (<https://www.oregon.gov/odf/working/pages/fpa.aspx>). Washington's Forest Practice Rules also have requirements for retention of live and dead wood for wildlife, riparian management zones, and other purposes (<https://app.leg.wa.gov/wac/default.aspx?cite=222>).

Regional biomass and bioenergy research indicates that biomass retention is more important on lower fertility sites, such as those that have courser soils. Other sites may not require as much biomass retention during harvests as post-harvest nutrient loss rates stabilize to levels similar to unharvested stands. Biomass markets may permit the harvest and removal of trees that would previously have been left in the woods to die, so they may reduce the prevalence of key habitat elements such as snags and downed logs. Reductions in dead wood due to increased biomass harvesting can affect water quality, soils, and site productivity. On the other hand, markets for biomass and other low value material may allow for the restoration of forests that have become unnaturally dense because of fire exclusion (i.e., densities are outside the historic range of variability). Restoration can alter fire behaviour, and the removal of low value trees can benefit remaining stands. However, the retention of large pieces of dead wood can mitigate risk of biomass harvest effects on biodiversity, while keeping small pieces of dead wood and foliage on-site can benefit water quality, soils, and site productivity.

Refer to the following sources for information:

- Ares, A., Terry, T. A., Harrison, R. A., Harrington, C. A., Piatek, K. B., Flaming, B. L., ... & Harrington, T. Achieving Long-term Site Productivity in the Pacific Northwest: Research-Driven Databases to Guide Best Management Practices.
- Knight, E. J. (2013). Harvest intensity and competing vegetation control have little effect on soil carbon and nitrogen pools in a Pacific Northwest Douglas-fir plantation (Doctoral dissertation).
- Root, A. M. (2017). The Effects of Biomass Removal and Vegetation Control on Douglas-fir Foliar Nitrogen and Phosphorus in the Pacific Northwest, USA (Doctoral dissertation).
- Deborah S. Page-Dumroese, Martin Jurgensen, Thomas Terry, Maintaining Soil Productivity during Forest or Biomass-to-Energy Thinning Harvests in the Western United States, Western Journal of Applied Forestry, Volume 25, Issue 1, January 2010, Pages 5–11, <https://doi.org/10.1093/wjaf/25.1.5>
- Evans, A. M. (2016). Potential ecological consequences of forest biomass harvesting in California. Journal of Sustainable Forestry, 35(1), 1-15. <https://doi.org/10.1080/10549811.2015.1104254>

	Despite concerns over the negative effects of biomass harvests, there is overall effective implementation of BMPs, including those related to biomass retention. State BMPs involve the use of harvest residues as soil conservation and water quality management mitigation measures. The National Association of State Foresters (NASF) Website serves as a clearinghouse for state water quality BMP reports (see https://www.stateforesters.org/bmps/). Recently, in 2019, NASF released “Protecting the Nation’s Water: State Forestry Agencies and Best Management Practices,” a national update on the use of BMPs. The report found that over all 50 states that BMPs are implemented at a rate of 92%. BMPs remain a valuable tool in reducing the negative impacts of harvesting to soil and water resources, including biota. SBP’s FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization’s suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization requires the use of BMPs in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	FSC-US NRA, V1-0 Federal laws, such as CWA BMPs State Foresters website Supplier contracts/ agreements SBP FSC and PEFC benchmarking
Risk Rating justification	Low risk conclusion for HCV category 3.4 in the FSC National Risk Assessment. The importance of well managed forests for HCV 4 (i.e., drinking water, watershed protection, erosion control, landslides, etc.) has been well documented. The following assessment of whether HCV 4 are threatened by forest management activities and/or whether they are effectively protected, focuses on forestry best management practices (BMPs) developed for compliance with federal regulations governing Non-Point Source pollution of US waters as a proxy for forest management practices that effectively protect HCV 4. The Clean Water Act (CWA), which is enforced by the US Environmental Protection Agency (EPA) establishes the basic structure for regulating discharges of pollutants (including sediment) into the waters of the

United States and regulating quality standards for surface waters. Overall, EPA monitoring indicates that contaminants are not uncommon, they are rarely associated with forest management activities- of all of the different sources of pollution and contaminants listed by the EPA, forest management is at the very bottom of the list. However, it can still be a contributor. Every state in the US has developed a set of forestry BMPs – some as early as the 1970s. BMPs are recognized by the CWA as being the best way to address nonpoint source pollution from land management activities, even though they do vary somewhat from state-to-state. However, in terms of HCV 4, states typically include BMPs that address wetlands (which would most likely include HCV 4 for flooding), steep slopes (which would most likely include HCV 4 for landslides and erosion control), and buffer zones adjacent to streams (which would most likely include HCV for erosion control). Therefore, if BMPs effectively protect these kinds of areas from degradation (and resulting water quality effects), it would be possible to conclude that they would also effectively protect HCV 4. All states with substantial levels of timber harvest have invested in nonpoint source pollution programs that are based on BMPs. Peer reviewed research has found that when forestry BMPs are implemented, they protect water quality. Indicator 4.19 of the National Report on Sustainable Forests indicates that the area and percent of forest land with significant soil degradation is low, suggesting that implemented BMPs are effective. Other research, though somewhat limited, supports this conclusion, with recognition that the level of effectiveness may vary some with the varying specifications of BMPs. Those states that have invested in BMP monitoring programs generally report high levels of compliance and/or few significant risks to water quality. Following a survey that requested results of state monitoring of BMPs, the National Association of State Foresters estimated that implementation rates average 91% nationwide. Additionally, evidence indicates that those implementation rates are increasing over time. Effectiveness of BMPs is also likely increasing with time, as they receive periodic review and revision.

Summary: Management practices that threaten HCV 4 (as defined by the FSC-US HCV Framework) would result in increased sediment and/or other pollutants in affected waters. Conversely, forest management practices that do not threaten water quality will also effectively maintain the provision of other ecosystem services by those same forests. Evidence of the effectiveness of forestry BMPs, combined with the reported levels of compliance, indicates that there is a high likelihood that HCV 4 are not being threatened by forest management practices throughout the assessment area due to the implementation of forestry BMPs associated with State nonpoint source pollution programs for compliance with the federal Clean Water Act.

Relevant laws include the Clean Water Act (CWA), which “establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters.” Source: <https://www.epa.gov/laws-regulations/summary-clean-water-act>
Most states, including the ones in the Supply Base, have adopted Best

	Management Practices (BMPs) for forestry, which have their basis in the Federal Water Pollution Control Act (FWPCA) of 1972. BMPs generally are quasi-regulatory; that is, they may become mandatory when violations are detected. Section 319 of the reauthorization of the FWPCA of 1987 required states to report to U.S. Congress on the status and impacts of non-point source pollution BMP include provisions for limiting soil disturbance and stabilizing areas where mineral soil is exposed. Source: R. Cristan et al. National status of state developed and implemented forestry Best Management Practices for protecting water quality in the United States For. Ecol. Manage. (2018) https://doi.org/10.1016/j.foreco.2017.07.002 The National Association of State Foresters (NASF) Website serves as a clearinghouse for state water quality BMP reports (see https://www.stateforesters.org/bmps/). Recently, in 2019, NASF released “Protecting the Nation’s Water: State Forestry Agencies and Best Management Practices,” a national update on the use of BMPs. The report found that over all 50 states that BMPs are implemented at a rate of 92%. BMPs are most critical in and around filter areas such as vegetated areas around waterbodies. Generally, there are two major objectives: • Minimize disturbance of forest floor, especially in filter areas; and • Stabilize areas of exposed soil within filter areas and in other locations where runoff has the potential to reach filter areas (including through use of harvest residues). BP FSC benchmarking concludes equivalency to this indicator. SBP PEFC benchmarking concludes equivalency to this indicator for processing residues. Several of the organization’s suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization requires the use of BMPs in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	Federal & State laws State air quality permits State Forestry Agency Websites State Forestry Agency Burning Permit Application Websites (e.g., Oregon ODF, Washington DNR, etc.) State Forest Action Plans\ SBP FSC and PEFC benchmarking
Risk Rating justification	Clean Air Act (CAA): states must have programs to protect air quality and visibility, including controls on prescribed burning and the use of ozone-depleting chemicals. Federal Insecticide, Fungicide and Rodenticide Act (FIFRA): regulates chemical use in forest stands, whether for insect control or

	for vegetation management. Clean Air Act, 42 USC §§ 7410–7671q - A clean air concern with forest management is often the smoke from prescribed burns. There are also concerns about pollution from vehicles. As with water pollution control, the federal government encourages states to develop their own laws and agencies, and delegates authority to them if the state system is at least as strict as the federal system. The organization has relevant air permits for its production facilities in Oregon (see https://deqonline.deq.state.or.us/aq/aqpermitsonline/SearchFilter.asp). Forest management activities that may have negative impacts to air quality are mostly prescribed burning. Permits or authorizations for prescribed burning are required in all states in the supply base. The organization does not engage directly in prescribed fire activities, though land managers in the supply base frequently use it as a tool for conservation or to control fuel loading, as described in State Forest Action Plans. Smoke from prescribed burning can lower air quality temporarily; however, the lack of burning may have negative impacts on fire-adapted species within the supply base. SBP FSC benchmarking concludes partial equivalency to this indicator. SBP PEFC benchmarking concludes equivalency to this indicator for processing residues. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified).
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	Federal and state laws, including FIFRA and licensed applicator requirements Supplier contracts/ agreements SBP FSC and PEFC benchmarking
Risk Rating justification	Environmental Impact Assessment: Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). 7 USC §§ 121–136y. The three basic requirements that apply to forest management are that (1) people can only sell and apply pesticides that have been approved by the federal government, (2) people can only use a pesticide in a manner consistent with the instructions on its label, and (3) people cannot obtain or apply especially dangerous pesticides unless they are licensed applicators. Plants that have been genetically modified to resist

pests are considered plant-pesticides, subject to FIFRA regulation. States can enact their own pesticide laws if they do not interfere with the regulatory scheme of FIFRA. For example, states may set rules limiting aerial spraying near streams or property lines or requiring pre-spray notice to neighbours. See, e.g., the standards discussed in this news story: Rob Davis, In Oregon, helicopters spray weed killers near people under West Coast's weakest protections.

OHSA 1910.266, Logging-specific regulations - 29 CFR

29 CFR 1910.1200 - The regulations for reporting to workers what toxic chemicals are onsite, applicable to all workplaces. These do not apply to pesticides bearing federally approved labels under the federal pesticide law (FIFRA), but safe handling of these pesticides is covered under FIFRA, as discussed below.

The FIFRA Agricultural Worker Protection Standard 40 CFR part 170 - applies to all pesticide use in forests as well as farms. It requires worker safety training, access to information, use of protective equipment, emergency preparedness, and so forth.

7 USC § 136i - FIFRA requires people who apply especially toxic ("restricted use") pesticides to be certified or to work under supervision of a certified applicator. The federal government can certify applicators, or it can delegate certification authority to a state that submits a satisfactory certification plan.

Legally required documents or records

OHSA requires employers to keep records of serious job-related injuries. See <https://www.OHSA.gov/recordkeeping/>. If there are hazardous chemicals other than pesticides at a worksite, there should be Material Safety Data Sheets for each chemical.

If there are pesticides, the pesticide label should be available. Official pesticide labels can be several pages long and contain information about the lawful purposes of use (what pests, what crops or trees to protect) and the lawful manner of use. Certified pesticide applicators should have documentation of their certification and should keep records of their use of restricted-use pesticides.

The Clean Water Act (CWA), which is enforced by the US Environmental Protection Agency (EPA) establishes the basic structure for regulating discharges of pollutants (including sediment) into the waters of the United States and regulating quality standards for surface waters. Overall, EPA monitoring indicates that contaminants are not uncommon, they are rarely associated with forest management activities- of all the different sources of pollution and contaminants listed by the EPA, forest management is at the very bottom of the list. However, it can still be a contributor. Pesticides are a source of impairment, but when used as part of forest management activities: the maximum concentrations observed in water have been much lower than the maximum levels considered safe by EPA, the types typically used have

	not been identified in surface or groundwater in significant concentrations; and they break down relatively rapidly in water. States included in the supply base require licensed applicators to apply chemicals commercially. BMPs described in state BMP manuals and/or chemical pesticide regulations/ licensing requirements typically include the following: • Consult with a pest management expert as needed for assistance in planning pesticide applications appropriate to the target pest and forest conditions; • Identify sensitive areas where water quality or specialized wildlife habitat could be affected by pesticide use; • Maintain adequate buffers between pesticide applications areas and adjacent sensitive areas such as waterbodies; • Apply pesticides during favourable weather conditions; • Pesticide labels are legal documents. Abide by all pesticide label requirements, including use rates, handling, personal protective equipment, storage and disposal; • All pesticide handling-mixing, loading, equipment cleaning, and storage-should be done away from waterbodies, outside filter areas and away from road drainage systems; • Remove stored pesticides from the site when they are no longer needed; • Have spill kits with absorbent materials and closeable containers on hand for mopping up spills. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization requires legal compliance in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Federal & State Laws (e.g., CERCLA) State BMPs Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and other federal & state laws cover releases of hydrocarbons and other hazardous substances. Access to these laws is available to personnel and suppliers via internet. The California Forest Practice Rules (https://www.fire.ca.gov/what-we-do/natural-resource-management/forest-practice), Oregon Forest Practices

	Act (https://www.oregon.gov/odf/working/pages/fpa.aspx) and Washington's Forest Practice Rules (https://app.leg.wa.gov/wac/default.aspx?cite=222) have requirements for handling and disposing of waste. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. SFI Fibre Sourcing requires adherence to OSHA requirements on certified and non-certified sources. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). State BMPs cover waste and spill prevention and response. The organization requires legal and BMP compliance in its supplier agreements/ contracts via its SFI Fibre Sourcing certificate. The organization requires legal compliance in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	USDA Forest Service Forest Inventory and Analysis (FIA) data Research publications Supplier contracts/ agreements SBP FSC and PEFC benchmarking
Risk Rating justification	Since 2003, growth continues to exceed removals on U.S. timber lands, as it has for more than 50 years. Overall, domestic removals of growing stock have declined from 15.8 to 15.5 billion cubic feet since 2003. This decline is also reflected in the statistics that conifers and broadleaf removals were 75 and 58 percent of growth respectively in 2003, and currently these values are 65 and 49 percent respectively. Demand has not subsided, and imports continue to rise to meet U.S. wood needs. The Forest Inventory and Analysis (FIA) program of the US Department of Agriculture Forest Service has been in continuous operation since 1930 with a mission to make and keep current a comprehensive inventory and analysis of the present and prospective conditions of and requirements for the renewable resources of the forest and rangelands of the US. The FIA Program collects, analyses, and reports information on the status and trends of America's forests: how much forest exists, where it exists, who owns it, and how it is changing, as well as how the trees and other forest vegetation are growing and how much has died or has been removed in recent years. This information can be used in many ways, such as in evaluating wildlife habitat conditions, assessing the sustainability of ecosystem management practices, and supporting planning and decision-making activities undertaken by public and private enterprises. (Source: https://www.fia.fs.fed.us/about/about_us/index.php)

	Source: https://public.tableau.com/views/FIA_OneClick_V1_2/Factsheet?%3AshowVizHome=no USDA forest service data, 2019, demonstrates that there is a net annual gain of standing forest inventory. Regeneration in the US is accomplished through a combination of planting and natural regeneration. In the Pacific Northwest (PNW), especially in Douglas-fir growing regions, most regeneration is from planted stock. Research and mapping projects generally support that regeneration becomes established in the PNW (i.e., Robert E. Kennedy, Zhiqiang Yang, Warren B. Cohen, Eric Pfaff, Justin Braaten, Peder Nelson, Spatial and temporal patterns of forest disturbance and regrowth within the area of the Northwest Forest Plan, Remote Sensing of Environment, Volume 122, 2012, Pages 117-133, ISSN 0034-4257, https://doi.org/10.1016/j.rse.2011.09.024 and Force of Nature: Mapping Forest Regeneration Hotspots; https://storymaps.arcgis.com/stories/87fa5cbe59f2460e9702a590314cdc0e. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization requires legal compliance in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	USDA Forest Service Forest Inventory and Analysis (FIA) data FAO Global Forest Resources Assessment Websites
Risk Rating justification	Since 2003, growth continues to exceed removals on U.S. timber lands, as it has for more than 50 years. Overall, domestic removals of growing stock have declined from 15.8 to 15.5 billion cubic feet since 2003. This decline is also reflected in the statistics that conifers and broadleaf removals were 75 and 58 percent of growth respectively in 2003, and currently these values are 65 and 49 percent respectively. Demand has not subsided, and imports continue to rise to meet U.S. wood needs. The Forest Inventory and Analysis (FIA) program of the US Department of Agriculture Forest Service has been in continuous operation since 1930 with a mission to make and keep current a comprehensive inventory and analysis of the present and prospective conditions of and requirements for the renewable resources of the forest and rangelands of the US. The FIA Program collects, analyses, and reports information on the status and trends of America's forests: how much forest exists, where it exists, who owns it, and how it is changing, as well as how the trees and other forest vegetation are

	growing and how much has died or has been removed in recent years. This information can be used in many ways, such as in evaluating wildlife habitat conditions, assessing the sustainability of ecosystem management practices, and supporting planning and decision-making activities undertaken by public and private enterprises. (Source: https://www.fia.fs.fed.us/about/about_us/index.php) Source: https://public.tableau.com/views/FIA_OneClick_V1_2/Factsheet?%3AshowVizHome=no USDA forest service data, 2019, demonstrates that there is a net annual gain of standing forest inventory. Regeneration in the US is accomplished through a combination of planting and natural regeneration. In the Pacific Northwest (PNW), especially in Douglas-fir growing regions, most regeneration is from planted stock. Research and mapping projects generally support that regeneration becomes established in the PNW (i.e., Robert E. Kennedy, Zhiqiang Yang, Warren B. Cohen, Eric Pfaff, Justin Braaten, Peder Nelson, Spatial and temporal patterns of forest disturbance and regrowth within the area of the Northwest Forest Plan, Remote Sensing of Environment, Volume 122, 2012, Pages 117-133, ISSN 0034-4257, https://doi.org/10.1016/j.rse.2011.09.024 and Force of Nature: Mapping Forest Regeneration Hotspots; https://storymaps.arcgis.com/stories/87fa5cbe59f2460e9702a590314cdc0e. FAO Global Forest Resources Assessment of 2020 demonstrates that forest cover is steady or increasing (p. 16) and that reforestation rates have steadily increased since the 1990s (p. 28). https://openknowledge.fao.org/server/api/core/bitstreams/be871447-7105-4a04-ad99-22fd5b60f7a2/content. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). The organization requires legal compliance in its supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	USDA Forest Service Forest Inventory and Analysis (FIA) data State Forest Action Plans SBP FSC and PEFC benchmarking
Risk Rating justification	According to the FSC-US National Risk Assessment, the US Pacific Northwest consists of several forest types, including natural and planted

	conifers, and naturally established hardwoods and mixed species forests. Forest composition in this region is determined primarily by the climate, soils, altitude, topography, and frequency of disturbance, all of which can vary greatly throughout this region of the US. Natural processes such as fires, pests, and pathogens are monitored by US Forest Services and State Forest and/or natural resource management agencies. US FIA data may be used to monitor forest growth and dynamics, including fire damage, and presence of pests and pathogens. The US Forest Service provides funding to state forestry agencies with forest management responsibilities on public lands, and statewide and regional fire prevention and response programs and oversight of pest and disease monitoring and management on all lands. Such agencies may also have responsibilities in public outreach and education on forest management issues including management of fire, pests, and diseases. These activities may be done in cooperation with university cooperative extension agencies. Refer to State Forest Action Plans for further details. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified).
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	FSC-US NRA, V1-0 SBP FSC and PEFC benchmarking
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 5 – Wood from forests in which genetically modified trees are planted. (Refer to the NRA for justification and explanation of the rationale for a low-risk conclusion). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified).
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	Paris Agreement SBP-endorsed RED Level A Risk Assessment for Article 29(7) LULUCF
Risk Rating justification	USA is a signatory of the Paris Agreement. https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXV-II-7-d&chapter=27&clang=_en Route A applies: LULUCF is covered by NDC, as per Section 3 (term is not explicitly mentioned): 'The NDC is economy-wide It reflects all anthropogenic emissions and removals as reported in the Inventory, and specifically: • All sectors, as defined by the IPCC 2006 guidelines; • All greenhouse gases included in the IPCC 2006 guidelines; • All categories, as included in the IPCC 2006 guidelines, occurring in the United States; • All carbon pools, as included in Volume 5 of the IPCC 2006 guidelines. Also, Section 5 'Assumptions and methodological approaches' includes the following: e(ii) Approach used to account for emissions and removals from harvested wood products: The United States intends to use a production approach consistent with the IPCC 2006 Guidelines to estimate emissions and removals from Harvested Wood Products, consistent with paragraph 56 of the Annex to decision 18/CMA.1. The methodology is described in detail in the Inventory.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	US FIA Data
Risk Rating justification	Option A applies. Since 2003, growth continues to exceed removals on U.S. timber lands, as it has for more than 50 years. Overall, domestic removals of growing stock have declined from 15.8 to 15.5 billion cubic feet since 2003. This decline is also reflected in the statistic that conifers and broadleaf removals were 75 and 58 percent of growth respectively in 2003, and currently these values are 65 and 49 percent respectively. Demand has not subsided, and imports continue to rise to meet U.S. wood needs. The Forest Inventory and Analysis (FIA) program of the US Department of Agriculture Forest Service has been in continuous operation since 1930 with a mission to make and keep current a comprehensive inventory and analysis of the present and prospective conditions of and requirements for the renewable resources of the forest and rangelands of the US. The FIA Program collects, analyses, and reports information on the status and trends of America's forests: how much forest exists, where it exists, who owns it, and how it is changing, as well as how the trees and other forest vegetation are growing and how much has died or has been removed in recent years. This information can be used in many ways, such as in evaluating wildlife habitat conditions, assessing the sustainability of ecosystem management practices, and supporting planning and decision-making activities undertaken by public and private enterprises. (Source: https://www.fia.fs.fed.us/about/about_us/index.php) Source: https://public.tableau.com/views/FIA_OneClick_V1_2/Factsheet?%3AshowVizHome=no USDA forest service data, 2019, demonstrates that there is a net annual gain of standing forest inventory in the supply base.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	USFS Silvics Manual Supplier contracts/ agreements
Risk Rating justification	The organization does not source primary feedstock. Suppliers must be feedstock specifications detailed in supplier agreements/contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	USGS Protected Areas Database NRCS Soil webpages Clean Water Act Supplier agreements/ contracts
Risk Rating justification	The organization does not source primary feedstock. Suppliers must be feedstock specifications detailed in supplier agreements/contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	Supplier agreements/ contracts Scale tickets
Risk Rating justification	Processing residues are used at the organization's production facility. Feedstock input types can be confirmed via supplier agreements/contracts and scale tickets.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	FSC-US National Risk Assessment Federal laws, such as NLRA and OSHA Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. Related federal laws in the US include the National Labor Relations Act (NLRA) and OSHA. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent

	certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	FSC-US National Risk Assessment Federal laws, such as US Constitution and 18 U.S. Code § 1589 - Forced labour Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. The 13th amendment of the US Constitution outlaws forced and compulsory labour, except as a punishment for crime whereof the party shall have been duly convicted. 18 U.S. Code § 1589 - Forced labour states that violations of forced labour may lead to prison terms of up to 20 years (Source: https://www.law.cornell.edu/uscode/text/18/1589). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	FSC-US National Risk Assessment Federal laws, such as 29 CFR § 570.2 - Minimum age standards Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. The minimum age for work in the US is 16 and 18 for hazardous work (Source: 29 CFR § 570.2 - Minimum age standards; https://www.law.cornell.edu/cfr/text/29/570.2). SBP's FSC and PEFC benchmarking concludes full equivalency to this

	indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	FSC-US National Risk Assessment Federal laws, such as 7 CFR § 15.3 - Discrimination prohibited Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. US code prohibits discrimination (Source: 7 CFR § 15.3 - Discrimination prohibited; https://www.law.cornell.edu/cfr/text/7/15.3). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment Interviews with workers Federal and state wage laws Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. The minimum wage in the Supply Base must meet or exceed the federally established minimum wage. State minimum wage laws in the Supply Base are readily accessible via internet sources (Source: https://www.dol.gov/general/topic/wages/minimumwage and https://www.law.cornell.edu).

	SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts. Interviews with workers or human resources staff (or equivalent) at the organization's production facility can use used to confirm compliance.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	FSC-US National Risk Assessment Federal laws, such as the Fair Labor Standards Act Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. The Fair Labor Standards Act (FLSA) of 1938 includes several provisions related to working hours (Source: https://www.law.cornell.edu/topn/black-connelly_fair_labor_standards_act). State laws must meet or exceed this federal law. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment Federal laws & regulations Supplier agreements/ contracts Interviews with workers SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level.

	The organization offers a comprehensive benefits package to its workers per the requirements of this indicator. Interviews with workers or human resources staff (or equivalent) at the organization's production facility can use used to confirm compliance. There are several federal regulations related to health care, retirement, worker's compensation and other items included in this requirement. See the Cornell Law School's Legal Information Institute for some examples: Social Security Act, Medicare, Federal Employment Compensation Act, etc. (Source: https://www.law.cornell.edu). SBP FSC benchmarking concludes partial equivalency to this indicator. SBP PEFC benchmarking concludes no equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	Federal laws & regulations, such as OSHA Proof of insurance Training records Interviews with EHS, HR, and staff Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	Workers at the production facility undergo regular training to comply with OSHA and insurance requirements. Interviews with Environmental Health & Safety (EHS) and Human Resources (HR), or equivalent, and/or workers can be used to determine low risk. Supporting records may include proof of insurance, OSHA inspection reports (or equivalent), insurance agent inspection reports, and training, among others. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance and use of trained/qualified forestry and logging professionals are required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and	Indicator
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Washington	
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	FSC-US National Risk Assessment Employee Handbook Federal laws & regulations Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. The organization has policies & procedures included in its Human Resources (HR) program that address this requirement. Refer to the Employee Handbook (or equivalent). There are several federal regulations related to resolving grievances and disputes in the workplace. See the Cornell Law School's Legal Information Institute for some examples: Equal Employment Opportunity, Fair Labour Standards Act, Workforce Investment Act, Social Security Administration, etc. (Source: https://www.law.cornell.edu). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment Interviews with workers Employee Handbook and related policies & procedures Training/ communications records Federal laws & regulations, such as OSHA Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	This criterion is included in the FSC-US National Risk Assessment. A low-risk conclusion for USA, at the Country level. The organization has policies & procedures included in its HR and EHS programs that address this requirement. Refer to the Employee Handbook (or equivalent) and related policies & procedures, and training/ communications records. Interviews with staff also support low risk.

	There are several federal regulations related to health & safety. See the Cornell Law School's Legal Information Institute for some examples: Occupational Health & Safety Act, Fair Labour Standards Act, 29 CFR § 1960.12 - Dissemination of occupational safety and health program information, 29 CFR § 505.6 - Safety and health standards, etc. (Source: https://www.law.cornell.edu). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	FSC-US National Risk Assessment Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	Low risk as per the FSC-US National risk assessment. Indicator 1.8 Timber harvesting regulations. All management activities must be consistent with the larger land and resource management plans. Land and resource plans must provide ecological, social and economic sustainability. Indicator 1.9 protection of sites and species. The US has a broad and comprehensive legal structure surrounding species protection and the protection of socially and ecologically important sites, administered at both the federal and state level. The quick way to find protected areas on a piece of public land is to look at the official management plan prepared by the agency responsible. Due to the transparency of planning and the active participation of interested members of the public, it is highly likely that the plan accurately identifies protected sites. On private lands, most concerns are due to protection of property rights and boundaries and water and soil resources. FSC-US NRA has concluded low risk for all indicators of FSC CW category 1 (illegally harvested wood). Landowners that receive tax benefits or incentives for maintain forestland must adhere to forest management planning requirements of the applicable federal and/or state programs. For protection of water resources, BMPs are used to avoid and mitigate impacts. For all management/ ownership types, FSC-US NRA has concluded low risk of violation for CW category 2, which deals with traditional and human rights.

	SFI Fibre Sourcing certification requires support or participation in programs for community engagement; social, cultural, or economic benefit assessments; conservation research; traditional ecological knowledge; business management; education and training; etc. SFI COC certification requires compliance to health & safety and social laws. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance and adherence to BMPs are required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Research studies Forestry consulting publications SBP FSC and PEFC benchmarking
Risk Rating justification	Research and forestry consulting publications support a low-risk conclusion since the US PNW has a strong forest product sector that regularly develops markets and new uses for harvested material, resulting in positive economic impacts. For example, USFS economics research through 1958-2023 shows that the number of persons employed in the forest industry has remained stable 2013-2023 in Washington and Oregon with an average of 56,900 persons employed. The lowest level of employment during the period was 54,400 in 2020, likely due to COVID related shutdowns (Source: Maher, Anna. 2024. Production, prices, employment, and trade in Northwest forest industries: 1958-2023. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. Online only.) A regional forest economy NGO puts the number of forest-related jobs in Washington at over 100,000 in 2023 (Source: https://data.workingforests.org), indicating multiplier effects of forest-related employment on industry. Per this source, working forests support the third largest manufacturing industry in the state. Another regional forest economy NGO estimates that 35 jobs are supported for every 1 million board feet of timber processed and that forest products-related jobs support higher than average wages in rural communities (Source: Solutions American Forest Resource Council). In California, the forest products sector declined significantly from 1998-2010, after which point it has remained relatively steady (Source: California's Forest Products Industry and Timber Harvest, 2021). The sector supports several direct jobs in forestry, harvesting, planting, wildlife management, and primary and secondary manufacturing. Indirect jobs include the service sector, such as banking, accounting, machinery, hospitality, and others. Per the Future of

	Work in California, the forest industry is in a state of transition, though still important. As more pulp mills close globally (Source: 2025 Sees Continued Pulp and Paper Mill Closures: What's Driving the Trend?), as well as other forest products mills regionally (Source: Oregon Mill Closures Emblematic of US Timber Industry Decline The Epoch Times and Columbia Pulp Has Idled Its Lyons Ferry Pulp Facility in Washington State), having alternative markets for processing residues is important to avoid landfilling of this material. SBP FSC benchmarking concludes equivalency to this indicator for processing residues. SBP PEFC benchmarking concludes partial equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified) and must support research into the topics related to this requirement through SFI Fibre Sourcing certification, mainly through participation in state SFI Implementation Committees to accomplish Objectives 5-7.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment Federal laws, such as Clean Water Act BMPs Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 3 indicators related to water supply and forest resource dependent communities (HCVs 5 and 6). (Refer to the NRA for justification and explanation of the rationale for a low-risk conclusion). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Water resources are protected through legal requirements (e.g., Clean Water Act) and BMPs. Legal compliance and adherence to BMPs are required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
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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	FSC-US National Risk Assessment Federal laws and treaties Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 2 – Wood harvested in violation of traditional and human rights. (Refer to the NRA for justification and explanation of the rational for a low-risk conclusion). Local communities do not have any special rights to forest resources on private lands in the Supply Base. Access to forest resources on public lands is governed through lease and permitting systems that do not qualify as permanent use rights nor transfer tenure to other parties. Federal laws require respect of indigenous rights where they exist. States may not enter treaties with indigenous tribes independent of the federal government. Treaties within the Supply Base can be accessed via the USFS Tribal Connections map (Source: https://www.arcgis.com/apps/webappviewer/index.html?id=fe311f69cb1d43558227d73bc34f3a32). Other federal laws relevant to this topic can be found at Cornell Law School's Legal Information Institute webpage. For example, the Indian Arts and Crafts Act, US Constitution, Treaty Indian Fisheries, Native American Graves Protection and Repatriation Act, etc. may govern how tribal resources are accessed and managed (Source: https://www.law.cornell.edu). Tribal resources outside of reservation lands tend to be on public lands and waters within treaty areas. Access and management of these resources is governed by treaties and other mechanisms as agreed upon between the US government and tribes. Consultation is as per the US Constitution, treaties, and other US laws. There are no treaty rights on private lands in the Supply Base. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). SFI COC and FS programs ensure support of indigenous rights and initiatives where they exist. Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment

	Federal and State laws Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 2 – Wood harvested in violation of traditional and human rights. (Refer to the NRA for justification and explanation of the rationale for a low-risk conclusion). There are several federal regulations related to resolving grievances and disputes over tenure and use rights on public and private lands. See the Cornell Law School's Legal Information Institute for some examples: https://www.law.cornell.edu/wex/private_property, US Constitution, etc. (Source: https://www.law.cornell.edu). The US Constitution's fourth, fifth, eighth, and fourteenth amendments include provisions relevant to property rights. Of these, the fifth amendment is the most important for establishing property rights and resolving disputes and grievances. States may have their own laws governing private and public property rights within the Supply Base. Generally, the court system is used to resolve such grievances and disputes. A sample of Federal and State mechanisms for resolving land tenure and use rights conflicts can be viewed on search engine results (e.g., https://duckduckgo.com/?t=h_&q=how+are+private+land+disputes+enforced+site%3A.gov&ia=web and https://www.google.com/search?q=how+are+private+land+disputes+enforced+site%3A.gov&client=firefox-b-1-d&sca_esv=bb6fb22019ea88f6&sca_upv=1&ei=sIOEZrUX5a3k2g-hypW4DQ&ved=0ahUKEwi1uNuwiomHAXXIFIkFHSFIBdcQ4dUDCBA&uact=5&oq=how+are+private+land+disputes+enforced+site%3A.gov&gs_lp=Egxn3Mtd2l6LXNlcnAiMGhvdyBhcmUgcHJpdmF0ZSBsYW5klGRpc3B1dGVzIGVuzm9yY2VkiHNpdGU6LmdvdKjDI1CiBViCIHABeAGQAQCYAW-gAfkFqgEDOC4yuAEDyAEA-AEBmAlHoALwBMICChAAGLADGNYEGEfCAgUQIRigAcICBRAhGKsCwgIFECEYnwWYAwCIBgGQBgiSBwM0LjOgB9Ms&scient=gws-wiz-serp#ip=1). SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	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	FSC-US National Risk Assessment

	Federal laws, including US Constitution and treaties Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	FSC National Risk Assessment for USA (FSC-NRA-US V1-0) has concluded low risk for Category 2 – Wood harvested in violation of traditional and human rights. (Refer to the NRA for justification and explanation of the rationale for a low-risk conclusion). Federal laws require respect of indigenous rights where they exist. States may not enter treaties with indigenous tribes independent of the federal government. Treaties within the Supply Base can be accessed via the USFS Tribal Connections map (Source: https://www.arcgis.com/apps/webappviewer/index.html?id=fe311f69cb1d43558227d73bc34f3a32). Other federal laws relevant to this topic can be found at Cornell Law School's Legal Information Institute webpage. For example, the Indian Arts and Crafts Act, US Constitution, Treaty Indian Fisheries, Native American Graves Protection and Repatriation Act, etc. may govern how tribal resources are accessed and managed (Source: https://www.law.cornell.edu). Tribal resources outside of reservation lands tend to be on public lands and waters within treaty areas. Access and management of these resources is governed by treaties and other mechanisms as agreed upon between the US government and tribes. Consultation is as per the US Constitution, treaties, and other US laws. There are no treaty rights on private lands in the Supply Base. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

United States California, Oregon, and Washington	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	FSC-US National Risk Assessment Federal laws, including US Constitution and treaties Supplier agreements/ contracts SBP FSC and PEFC benchmarking
Risk Rating justification	The FSC-US National Risk Assessment concludes low risk at a national level for Category 2: Wood Harvested in Violation of traditional and human rights. Indicator 1.8 Timber harvesting regulations. All management activities must be consistent with the larger land and resource management plans. Land and resource plans must provide ecological, social and economic sustainability.

	The US has a broad and comprehensive legal structure surrounding species protection and the protection of socially and ecologically important sites, administered at both the federal and state level. The quick way to find protected areas on a piece of public land is to look at the official management plan prepared by the agency responsible. Due to the transparency of planning and the active participation of interested members of the public, it is highly likely that the plan accurately identifies protected sites. Source indicator 1.9 protection of sites and species. Federal and state laws cover preservation of cultural and historic sites (Source: 36 CFR § 61.4 - State programs; https://www.law.cornell.edu/cfr/text/36/61.4; 41 CFR § 101-8.311 - Historic Preservation Programs; https://www.law.cornell.edu/cfr/text/41/101-8.311). Federal laws require respect of indigenous rights where they exist. States may not enter treaties with indigenous tribes independent of the federal government. Treaties within the Supply Base can be accessed via the USFS Tribal Connections map (Source: https://www.arcgis.com/apps/webappviewer/index.html?id=fe311f69cb1d43558227d73bc34f3a32). Other federal laws relevant to this topic can be found at Cornell Law School's Legal Information Institute webpage. For example, the Indian Arts and Crafts Act, US Constitution, Treaty Indian Fisheries, Native American Graves Protection and Repatriation Act, etc. may govern how tribal resources are accessed and managed (Source: https://www.law.cornell.edu). Tribal resources outside of reservation lands tend to be on public lands and waters within treaty areas. Access and management of these resources is governed by treaties and other mechanisms as agreed upon between the US government and tribes. Consultation is as per the US Constitution, treaties, and other US laws. There are no treaty rights on private lands in the Supply Base. SBP's FSC and PEFC benchmarking concludes full equivalency to this indicator. Several of the organization's suppliers carry PEFC-equivalent certification (i.e., SFI-certified). Legal compliance is required in supplier agreements/ contracts.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

All processing residues are inspected upon arrival at the organization's pellet mill. Feedstock is subject to laboratory analysis, including moisture content and other variables. Records of feedstock types and laboratory analysis are in volume summary reports and may be on scale tickets. A supplier self-declaration has been incorporated into supplier contracts/ agreements.

The supplier list contains and is used to track all elements of supplier verification for processing residues (4A), including:

- i. Name and address of the supplier;
- ii. Type of supplier (i.e., producer, purchaser/collector from point of reclamation, Trader);
- iii. Categories of feedstock supplied (i.e., processing residues, post-consumer);
- iv. Level of control required (i.e., visual inspection upon receipt, supplier audits – see Annex 1, sections 2 and 3 below); and
- v. Self-declaration that the feedstock qualifies as processing residues or post-consumer feedstock according to SBP.

The organization monitors conformance of its suppliers with SBP definitions and purchase specifications through periodic supplier audits.

Non-compliant feedstock may result from failure to meet SBP or EU RED feedstock definitions. Non-compliant supplier documents could result from failure to sign updated agreements, self-declarations and/or documentation that does not address SBP/EU RED requirements. In such cases, feedstock may be deemed ineligible for SBP products until sufficient corrective and/or preventative measures are implemented within a timeframe agreed upon with the supplier, but no longer than 6 months. Suppliers may be invalidated for failure to address non-compliances.

Feedstock inspection and classification upon receipt

All processing residues are inspected upon arrival at the organization's pellet mill. Feedstock is subject to laboratory analysis, including moisture content and other variables. Records of feedstock types and laboratory analysis are in volume summary reports and may be on scale tickets. A supplier self-declaration has been incorporated into supplier contracts/ agreements.

Non-compliant feedstock may result from failure to meet SBP or EU RED feedstock definitions. Non-compliant supplier documents could result from failure to sign updated agreements, self-declarations and/or documentation that does not address SBP/EU RED requirements. In such cases, feedstock may be deemed ineligible for SBP products until sufficient corrective and/or preventative measures are implemented within a timeframe agreed upon with the supplier, but no longer than 6 months. Suppliers may be invalidated for failure to address non-compliances.

Supplier audit for processing residues and post-consumer feedstock

The organization sources processing residues resulting from each supplier's milling operations. All feedstock is initially processed at the supplier's facility. Operations are thus verified onsite regularly. The organization maintains information on each supplier's operations in its supplier risk assessment.

Supplier audits are documented for each supplier. A summary of all supplier audit results is prepared annually. The sample is normally at least $\sqrt{x}$ rounded up to the nearest whole number, where x is the number of active suppliers during the reporting period. Justification for reduced sampling is documented in the audit summary.

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).