

# Shaw Resources – Eastern Embers Supply Base Evaluation

SBR template version 1 (January, 2017)

# Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	<p><b>Scope:</b> The supply base is considered Nova Scotia (NS), New Brunswick (NB), and Prince Edward Island (PEI).</p> <p>NS, NB, &amp; PEI Eco regions:  <i>Eastern Canadian Forest</i>  <i>New England-Acadian Forest</i>  <i>Gulf of St. Lawrence lowland Forest</i></p>
Means of Verification	<p><b>Evidence:</b>  Source WWF Eco regions  <a href="http://www.worldwildlife.org/science/wildfinder/">http://www.worldwildlife.org/science/wildfinder/</a></p>
Evidence Reviewed	Map of supply base area and secondary feedstock sources
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>The company conducts wood procurement operations including purchase and transport of sawmill residuals (chips, shavings &amp; sawdust). The procured wood fibre is transported on trucks to the company's pellet mill facility. Typically, the company purchases both certified (typically to PEFC or SFI) and uncertified fibre. The wood fibre originates from within the identified Eco regions listed above (1.1.1).</p> <p>Regional risk assessments have been prepared for the entire supply base (NS, NB, and PEI). The framework of the risk assessment also includes measures to mitigate risk during procurement activities. Feedstock is Beech, Poplar, Hemlock, Ash, Birch, Maple, Aspen, Balsam Fir, Spruce, Cedar, Pine or Spruce wood fibre.</p> <p>All secondary feedstock suppliers have signed a "Supplier's Assertion". The assertion declares that all of the feedstock that they provide originates from within the defined supply base of NS, NB and PEI.</p>
Means of Verification	<p><b>Evidence:</b>  Regional Risk Assessment  Supplier Assertions  Sales Documents  Scale tickets, bills of lading, Transportation Certificates</p>
Evidence Reviewed	NB, NS, and PEI Risk Assessments, Scale tickets, Transportation Certificates
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

Measure	
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	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	The species and type of feedstock (sawdust, shavings, chips, etc) are documented on the scale ticket, bill of lading, or Transportation Certificate.
Means of Verification	<b>Evidence:</b> Sales Documents Scale tickets, bills of lading, transportation certificates
Evidence Reviewed	Scale tickets, bills of lading, transportation certificates
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	<p>There is strong legislation in place in NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented. Each province has their own Registration Act that ensures that the province and private land owners are able to obtain a guaranteed property title ensuring the legality of land ownership. Land use is regulated with municipal by-laws.</p> <p><b>Nova Scotia</b> Private woodlot owners are the primary source of forest products for industry. The Nova Scotia Registry of Buyers is a registry where businesses and individuals register to acquire primary forest products for processing. For private woodlots, Best Management Practices (BMPs) are in place through the Nova Scotia Forest Alliance, in which most major sawmill residual suppliers are partners and associated members. Nova Scotia’s Land Registration Act ensures that both Crown and private land owners are able to obtain a guaranteed title to a property.</p> <p><b>New Brunswick</b> The Department of Natural Resources (NBDNR) partitions provincial Crown forest into Timber Licences. Timber licences are allocated to licensees, who are responsible for developing and managing the forests to achieve the goals, objectives and standards set out by the government. NBDNR reviews the performance of the licensee’s management of the lands on a 5-year cycle. Most Crown land in NB is forest management certified to SFI.</p> <p>Private woodlots in NB are managed through Regional Marketing Boards. The Marketing Boards encourage BMPs and monitor feedstock to ensure it doesn’t originate from controversial sources. NB legislation requires that the Property Identification Number (PID) be documented on all transportation certificates (TC) from private woodlots. This allows the end user to track the material back to the</p>

	<p>source lot.</p> <p><b>Prince Edward Island</b>  Only 13% of PEI's forest is publicly owned. The province does not allocate long term timber rights on public lands like in other province. The province will enter into co-management agreements for public lands where a group is able to manage the forest in line with the goals and values outlined in the 2006 Forest Policy and Ecosystem-based Forest Management Standards Manual. There are currently co-management agreements with environmental and First Nations groups. All forest products are sold via public tender. The winning bidder acquires the stumpage rights for the particular site and is given a specified time to complete the work. Failure to comply with the terms and conditions of the harvest contract results in penalties.</p>
Means of Verification	<p><b>Evidence:</b>  PEFC EMS Manual, PEFC documentation and records, Supplier Assertion, Load and Scale Slips/Transportation Certificates  NS Land Registration Act:  <a href="http://nslegislature.ca/legc/statutes/landreg.htm">http://nslegislature.ca/legc/statutes/landreg.htm</a>  NB Registry Act:  <a href="http://laws.gnb.ca/en/showpdf/cs/R-6.pdf">http://laws.gnb.ca/en/showpdf/cs/R-6.pdf</a>  PEI Registry Act:  <a href="https://www.princeedwardisland.ca/sites/default/files/legislation/r-10.pdf">https://www.princeedwardisland.ca/sites/default/files/legislation/r-10.pdf</a>  PEI 2006 Forest Policy  <a href="http://www.gov.pe.ca/photos/original/EEF-ForPol-Eng.pdf">http://www.gov.pe.ca/photos/original/EEF-ForPol-Eng.pdf</a>  NBDNR Audits available online:  <a href="http://www2.gnb.ca/content/gnb/en/departments/natural_resources/ForestsCrownLands/content/TimberHarvestingScaling.html">http://www2.gnb.ca/content/gnb/en/departments/natural_resources/ForestsCrownLands/content/TimberHarvestingScaling.html</a>  NS Registry of Buyers Annual Report:  <a href="http://novascotia.ca/natr/forestry/registry/ann_report.asp">http://novascotia.ca/natr/forestry/registry/ann_report.asp</a></p>
Evidence Reviewed	Environmental Management System (EMS) Manual, PEFC documentation and records, Supplier Assertion, Load and Scale Slips/Transportation Certificates
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	<p>The UN Security Council has not issued a ban on timber exports from NS, NB, or PEI; there are no Security Resolutions for Canada listed on the website (searched Resolutions from 2000-2008). Canada is not designated as a source of conflict timber.</p> <p>The federal Department of Fisheries and Oceans also enforces aspects of the Fisheries Act that may pertain to logging related activities on both Crown and private managed forest land.</p> <p>Transparency International maintains a website with regularly updated information regarding perceptions of corruption at the national level; the 2008 Corruption Perception Index for Canada is among the highest in relation to the rest of the world (i.e., is perceived to have a very low rate of corruption).</p>

Canadian Council of Forest Ministers maintains data to indicate progress on sustainable forest management, including assessing general compliance with laws and regulations as documented in the 2005 National Status Report.

### **Nova Scotia**

Crown and private lands are governed by the NS Forest Act and the Crown Lands Act. The enforcement division of NSDNR is responsible for the monitoring of these acts. NSDNR manages allocations assigned on Crown Lands. A Crown allocation map is available online. The Code of Forest Practice provides guidelines for sustainable forest management that are mandatory on Crown lands (administered by NSDNR), and highly encouraged on private woodlots. A letter of authority detailing the allowable products and maximum allowable cut is issued by NSDNR.

### **New Brunswick**

The enforcement of the NB Transportation of Primary Forest Products Act ensures that transportation certificates (TC) are accurately completed. TC's are mandatory for each load of feedstock and are subject to audits by NBDNR and NB Forest Products Commission. In addition, all Crown lands and industrial freehold private lands are 3rd party certified (SFI, FSC, or CSA) and undergo annual audits.

Private woodlots owners undergo audits at random through Regional Marketing Boards to ensure that Best Management Practices (BMP's) are being used.

### **Prince Edward Island**

The province of PEI does not allocate long term timber rights on public lands like in other province. The province will enter into co-management agreements for public lands where a group is able to manage the forest in line with the goals and values outlined in the 2006 Forest Policy and Ecosystem-based Forest Management Standards Manual. There are currently co-management agreements with environmental and First Nations groups. All forest products are sold via public tender. The winning bidder acquires the stumpage rights for the particular site and is given a specified time to complete the work. Failure to comply with the terms and conditions of the harvest contract results in penalties.

The province will provide technical advice and financial assistance to private woodlots that practice forestry in compliance with the standards of the Ecosystem-based Forest Management Standards Manual. However, management and harvest decisions are the right and responsibility of the property owner.

### **Supporting Information:**

<http://www.un.org/documents/scres.htm>

<http://www.illegal-logging-info/>

NSDNR – Code of Forest Conduct:

<http://novascotia.ca/natr/forestry/reports/Code-of-Forest-Practice.pdf>

NBDNR Annual Report & Crown Forestry Agreements:

[http://www2.gnb.ca/content/gnb/en/departments/natural\\_resources/Publications.html](http://www2.gnb.ca/content/gnb/en/departments/natural_resources/Publications.html)

NBDNR Website (Annual crown forest audits):

[http://www2.gnb.ca/content/gnb/en/departments/natural\\_resources.html](http://www2.gnb.ca/content/gnb/en/departments/natural_resources.html)

PEI Forest Policy

[https://www.princeedwardisland.ca/sites/default/files/publications/forest\\_policy-english-sept-19.pdf](https://www.princeedwardisland.ca/sites/default/files/publications/forest_policy-english-sept-19.pdf)

PEI 2010 State of the forest report

<http://www.gov.pe.ca/photos/original/2010StateFrstrp.pdf>

DFO Canada Enforcement (Annual Reports) of the Fisheries Act:

[http://www.dfo-mpo.gc.ca/oceans-habitat/habitat/measuring-mesures/reports-rapports/index\\_e.asp](http://www.dfo-mpo.gc.ca/oceans-habitat/habitat/measuring-mesures/reports-rapports/index_e.asp)

Means of  
Verification

	<p>Canadian Council of Forest Ministers 2005 National Status Report:  <a href="http://www.ccmf.org/current/ccitf_e.php">http://www.ccmf.org/current/ccitf_e.php</a>          Transparency International (refer to tab on left "Global Corruption"):  <a href="http://www.transparency.org">http://www.transparency.org</a>          Global Witness:  <a href="http://www.globalwitness.org">http://www.globalwitness.org</a>          Environmental Investigation Agency:  <a href="http://www.eia-international.org">http://www.eia-international.org</a>          The Royal Institute of International Affairs:  <a href="http://www.illegal-logging.org">http://www.illegal-logging.org</a></p>
Evidence Reviewed	EMS Manual, Provincial Governmental Reports
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	<p><b>New Brunswick</b>            In NB, licensees are responsible for the proper scaling and remitting of all royalties. The records of royalty payments for each of the 10 licensees are published in the NBDNR annual report.</p> <p><b>Nova Scotia</b>            In NS, buyers must submit statistical returns indicating the volume of wood purchased. Export documents must be kept on hand and provided upon request of the minister.</p> <p>Both Private and Crown forest products must comply with the Forests Sustainability Regulations. Buyers who obtain more than 5,000 cubic meters/year of privately sourced wood must provide silviculture treatments. Those with rights to Crown land must pay royalties for all timber products harvested. NSDNR's regional field staff and conservation officers monitor and enforce activities on Crown lands to prevent unauthorized harvest or theft of timber. Private landowners rely on commercial or civic laws to protect their property from timber theft or to enforce the terms of a business transaction.</p> <p><b>Prince Edward Island</b>            PEI's Forest Renewal Program Regulations stipulate that all commercial softwood harvested on public or private lands are subject to a \$2/cord Forest Management Checkoff Fee. This is reinvested into forest management programs for public and participating private lands.</p>
Means of Verification	<p>NS Registry of Buyers Annual Report:  <a href="http://novascotia.ca/natr/forestry/registry/ann_report.asp">http://novascotia.ca/natr/forestry/registry/ann_report.asp</a>            NBDNR Annual Reports:  <a href="http://www2.gnb.ca/content/gnb/en/departments/natural_resources/Publications.htm">http://www2.gnb.ca/content/gnb/en/departments/natural_resources/Publications.htm</a>  <a href="#">1</a>            PEI Forest Renewal Program Regulations  <a href="https://www.princeedwardisland.ca/sites/default/files/legislation/f14-1.pdf">https://www.princeedwardisland.ca/sites/default/files/legislation/f14-1.pdf</a></p>
Evidence Reviewed	Review of provincial & national legislation

Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	<p>The company does not procure any raw materials from the list of species deemed threatened or endangered as classified by CITES. Documentation of the species type and source of incoming fiber ensure that endangered or threatened species are not being used.</p> <p>As a Party to CITES, Canada has an international obligation to regulate the trade in CITES-listed wild animals and plants. The Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA) and the Wild Animal and Plant Trade Regulations (WAPTR) provide the legislation for CITES controls in Canada.</p>
Means of Verification	<p><b>Evidence:</b>  <a href="http://www.cites.org">http://www.cites.org</a>  <a href="https://www.ec.gc.ca/alef-ewe/default.asp?lang=en&amp;n=65FDC5E7-1">https://www.ec.gc.ca/alef-ewe/default.asp?lang=en&amp;n=65FDC5E7-1</a></p>
Evidence Reviewed	
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	<p>The Canadian Charter of Rights and Freedoms forms the first part of the Constitution Act (1982). The bill guarantees certain political rights of Canadian Citizens and civil rights to everyone in Canada. Aboriginal rights, like treaty rights, are recognized by Section 35 of the Constitution Act. Historically, Aboriginal rights have been achieved by way of treaty or land claims settlement rather than through legislation.</p> <p>The new Aboriginal Forestry Initiative (AFI) is the federal government’s approach to enhance aboriginal participation in Canada’s forest sector. The AFI is supported by Natural Resources Canada and Aboriginal Affairs and Northern Development Canada.</p>
Means of Verification	<p><b>Evidence:</b>  <a href="http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm">http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm</a>  <a href="http://www.nafaforestry.org/pdf/2015/First%20Nation-Held%20Forest%20Tenure%20Report%202015.pdf">http://www.nafaforestry.org/pdf/2015/First%20Nation-Held%20Forest%20Tenure%20Report%202015.pdf</a>  <a href="http://www.nrcan.gc.ca/forests/federal-programs/13125">http://www.nrcan.gc.ca/forests/federal-programs/13125</a></p>



Evidence Reviewed	Review of Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.1.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	<p><b>Nova Scotia</b> High conservation value forests on Crown Lands are protected through legislation, and enforced by NSDNR. On private lands, designation and protection require agreement with the landowner.</p> <p><b>New Brunswick</b> Protected Natural Areas (PNA) are mapped and sites of high or unique ecological, historical, cultural or scenic value are preserved.</p> <p><b>PEI</b> The Natural Areas Protection Act (NAPA) allows for the designation and protection of rare, unique and critical ecological and geological features on public and private lands. Currently, 3.2% of the province is designated under NAPA.</p> <p>There are no biodiversity hotspots in the supply base area. There is no overlap of the company's supplier's wood sourcing area with the WWF Global 200 eco-region designation. Canada is a signatory of the convention of international trade in endangered species of wild fauna and flora</p>
Means of Verification	<p><b>Supporting evidence:</b> High Conservation Value Network <a href="http://www.hcvnetwork.org">http://www.hcvnetwork.org</a> Forests with exceptional Conservation Value: <a href="http://www.sfiprogram.org/files/pdf/draft2015-2019-standard-section-6/">http://www.sfiprogram.org/files/pdf/draft2015-2019-standard-section-6/</a> NatureServe: <a href="http://www.natureserve.org">http://www.natureserve.org</a> Global Forestry Risk Registry: <a href="http://www.globalforestregistry.org/">http://www.globalforestregistry.org/</a> Conservation Internationals Global Hotspots: <a href="http://www.biodiversityhotspots.org">http://www.biodiversityhotspots.org</a> WWF Global 200 Regions: <a href="http://worldwildlife.org/science/ecoregions/global200.html">http://worldwildlife.org/science/ecoregions/global200.html</a> WWF Terrestrial Eco region Profiles: <a href="http://worldwildlife.org/wildworld/terrestrial">http://worldwildlife.org/wildworld/terrestrial</a> FSC Canada Global Forest Watch Intact Forest Database: <a href="http://fsccanada.org/docs/37b60f3055c5cds17c.pdf">http://fsccanada.org/docs/37b60f3055c5cds17c.pdf</a> Nova Scotia Endangered Species Act <a href="http://nslegislature.ca/legc/statutes/endspec.htm">http://nslegislature.ca/legc/statutes/endspec.htm</a> PEI's Natural Area Protection Act <a href="https://www.princeedwardisland.ca/sites/default/files/legislation/n-02.pdf">https://www.princeedwardisland.ca/sites/default/files/legislation/n-02.pdf</a></p>
Evidence Reviewed	Maps showing areas of high conservation value

Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.1.2	The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	<p>7% of Canadian forests (24 million hectares) are designated as protected areas. The National Parks Act was developed to help create and manage these protected areas. Most of these protected forests have become National or Provincial Parks, and the remainder are wildlife reserves.</p> <p>Watercourses and wetlands are protected through Canada's Water Act. These are also regulated through provincial regulations. These acts not only protect the quality of the water, but also ensure that sufficient buffers are maintained around all waterways.</p> <p><b>Nova Scotia</b> High conservation value habitats are protected under the Nova Scotia Endangered Species Act. On private lands, designation and protection require agreement with the landowner.</p> <p><b>New Brunswick</b> Protected Natural Areas (PNA) are mapped and sites of high or unique ecological, historical, cultural or scenic value are preserved. All Crown lands are third party certified. In 2015, the New Brunswick Provincial government developed a map that shows Crown land conservation areas in New Brunswick. Most areas considered High Conservation Value Forest are protected through federal and provincial government legislation (i.e. Protected Natural Areas Act, Parks Act, Crown Lands Act, etc). The marketing boards assist private woodlot owners in identifying any areas of high conservation value in their forest management plans.</p> <p><b>Prince Edward Island</b> The Natural Areas Protection Act (NAPA) allows for the designation and protection of rare, unique and critical ecological and geological features on public and private lands. Currently, 3.2% of the province is designated under NAPA.</p> <p>The supply base doesn't include any areas listed as critical or vulnerable according to WWF's Global 200 Ecoregions.</p>
Means of Verification	<p><b>Supporting Information:</b> PEFC Wood Procurement processes Best Management Practices SFI Implementation Committee surveys of private woodlots (NB SIC Survey) Nova Scotia Endangered Species Act <a href="http://nslegislature.ca/legc/statutes/endspec.htm">http://nslegislature.ca/legc/statutes/endspec.htm</a> WWF's Global 200 Ecoregions: <a href="http://wwf.panda.org/about_our_earth/ecoregions/maps/">http://wwf.panda.org/about_our_earth/ecoregions/maps/</a> Canada's forest governance framework: <a href="http://www.nrcan.gc.ca/forests/canada/laws/13303#section-2">http://www.nrcan.gc.ca/forests/canada/laws/13303#section-2</a></p>
Evidence Reviewed	PEFC Wood Procurement processes Best Management Practices

	SFI Implementation Committee surveys of private woodlots
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.1.3</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	There are no forests by the definition in the standard that fit the definition of a production plantation forest in the supply area. All fibre is procured or produced from Crown or private forest land in its native state.
Means of Verification	<b>Evidence:</b> Risk Assessments Supplier Assertions
Evidence Reviewed	NB, NS, and PEI Risk Assessments Supplier Assertions
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.2.1</b>	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	All feedstock originates from within NB, NS or PEI. Supplier assertions specify the region of origin of the feedstock (NB, NS & PEI) are signed by all suppliers. A Supplier Based Evaluations is also completed annually on 25% of our suppliers. These evaluations help to identify how the supplier tracks the feedstock back to the forest. Risk assessments have been completed for each of the 3 source provinces.  FM-certified forests are required to maintain an operating and harvest plan for the forest and must update these on an annual cycle. Private woodlots are required to follow best management practices and have operating/harvesting plans to be considered for silvicultural funding.
Means of Verification	<b>Evidence:</b> EMS Manual PEFC Chain of Custody Certification NB SIC Survey
Evidence Reviewed	EMS Manual PEFC Chain of Custody Certification NB SIC Survey

Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b>	<input type="checkbox"/> <b>Specified Risk</b>	<input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure			

	Indicator		
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).		
Finding	<p><b>Nova Scotia</b> The Nova Scotia's Code of Forest Practice states that forest management will be designed and conducted in a manner that maintains and enhances the quality of air, water, and soil. The Watercourse and Wildlife Habitat Protection Regulations require that on Crown and Private lands that buffer strips must be left along watercourses, legacy trees must be left in clumps, and coarse woody debris must be left in all types of forest harvesting and management activities. In Nova Scotia, BMP's are provided to private woodlot owners through regional organizations who assist private woodlot owners in their forests' management.</p> <p><b>New Brunswick</b> Regional forests have implemented Best Management Practices (BMPs) for Soil, Water, Ecological, Geological, Historical, Cultural, Wildlife, Biodiversity and Special Sites.</p> <p>BMP's are supplied to private woodlot owners through the Regional Marketing Boards. A supplier specific risk assessment will be completed and included with every contract to determine whether a site specific inspection will be completed. Furthermore, the marketing boards complete annual audits on a selection of their primary wood private woodlot suppliers. These data are summarized in an annual report. Adherence to the Clean Water Act, Watercourse Buffer Zone Guidelines is also required in both private and Crown forests in NB.</p> <p><b>Prince Edward Island</b> The PEI Model Forest Network Partnership, working adjunct to the Nova Forest Alliance, seeks to improve the quality, size and biodiversity of PEI forests. The organization offers programs and services that help enhance awareness of sustainable forest management. The PEI Department of Environment, Energy and Forestry is an associate member of the Nova Forest Alliances. The Nova Forest Alliance provides a Best Management Practices Manual to all members as a tool to follow the principles of Forest Stewardship. The manual provides procedures and controls to prevent soil erosion and improve quality.</p>		
Means of Verification	<p><b>Supporting Information:</b> PEFC wood procurement processes Company risk assessments Wood producer information packages</p>		
Evidence Reviewed	PEFC wood procurement processes, NB, NS, and PEI risk assessments		
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b>	<input type="checkbox"/> <b>Specified Risk</b>	<input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure			

	Indicator
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	<p><b>Nova Scotia</b> The Nova Scotia's Code of Forest Practice states that forest management will be designed and conducted in a manner that maintains and enhances the quality of air, water, and soil. The Watercourse and Wildlife Habitat Protection Regulations require that on Crown and Private lands that buffer strips must be left along watercourses, legacy trees must be left in clumps, and coarse woody debris must be left in all types of forest harvesting and management activities. In Nova Scotia, BMP's are provided to private woodlot owners through regional organizations who assist private woodlot owners in their forests' management.</p> <p><b>New Brunswick</b> Crown regional forests have implemented Best Management Practices (BMPs) for Soil, Water, Ecological, Geological, Historical, Cultural, Wildlife, Biodiversity and Special Sites. BMP's are supplied to private woodlot owners through the Regional Marketing Boards. A supplier specific risk assessment will be completed and included with every contract to determine whether a site specific inspection will be completed. Furthermore, the marketing boards complete annual audits on a selection of their primary wood private woodlot suppliers. These data are summarized in an annual report. Adherence to the Clean Water Act, Watercourse Buffer Zone Guidelines is also required in both private and Crown forests in NB.</p> <p><b>Prince Edward Island</b> The Wetland Policy for PEI works with the existing legislation, regulations and policies to protect wetlands. All wetlands are protected under section 10 of the Environmental Protection Act to ensure that there is no net loss of wetlands and wetland function. Prince Edward Islands Provincial Forests are public lands that are managed based on the Ecosystem-based Forest Management Manual. Forest Management Plans are prepared and listed are available online for comment before plans are finalized. Some sites are designated as Natural Areas and may include those areas with rare or uncommon plant species, geological features, special habitats, etc. 8,509 ha in PEI is classified as Natural Protected Areas. These areas are protected from all development. Wildlife Management areas occur on both private and public lands and are protected under the Wildlife Conservation Act. These areas are maintained for the protection, management and conservation of wildlife and its habitat. There are currently 5,430 hectares of land that are designated as Wildlife Management Areas.</p>
Means of Verification	<p><b>Supporting Information:</b> Canada - National Parks Act NB – Protected Natural Areas Act, Parks Act NS – Special Places Protection Act, Wilderness Areas Protection Act, Nature Reserves Protection Act, Provincial Parks Act PEI – Natural Areas Protection Act Company risk assessments NB SIC Survey</p>
Evidence Reviewed	NS, NB, and PEI Risk Assessments, NB SIC Survey, Local & National Legislation requirements
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

Comment or Mitigation Measure	
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	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	<p><b>Nova Scotia</b> In NS, the Nova Scotia's Code of Forest Practice states that forest management will be designed and conducted in a manner that maintains and enhances the quality of air, water, and soil. The Watercourse and Wildlife Habitat Protection Regulations require that on Crown and Private lands that buffer strips must be left along watercourses, legacy trees must be left in clumps, and coarse woody debris must be left in all types of forest harvesting and management activities. In Nova Scotia, BMP's are provided to private woodlot owners through regional organizations who assist private woodlot owners in their forests' management.</p> <p><b>New Brunswick</b> Regional forests have implemented Best Management Practices (BMPs) that ensure that biodiversity is protected. BMP's are supplied to private woodlot owners through the Regional Marketing Boards. A supplier specific risk assessment is completed and included with every contract to determine whether a site specific inspection will be completed. Furthermore, the marketing boards complete annual audits on a selection of their primary wood private woodlot suppliers. These data are summarized in an annual report.</p> <p>Computer based modelling software is used to create maps of forest inventory data. These maps show Eco regions, species present and include areas which are considered more vulnerable, including sites of endangered species, waterways, deer wintering areas and old-spruce forests. These maps are used in the management plans to ensure that biodiversity of the Crown forest is maintained.</p> <p><b>Prince Edward Island</b> Some sites in PEI are designated as Natural Areas and may include those areas with rare or uncommon plant species, geological features, special habitats, etc. 8,509 hectares of land in PEI is classified as Natural Protected Areas. These areas are protected from all development. Wildlife Management areas occur on both private and public lands and are protected under the Wildlife Conservation Act. These areas are maintained for the protection, management and conservation of wildlife and its habitat. There are currently 5,430 hectares of land that are designated as Wildlife Management Areas.</p>
Means of Verification	<p><b>Supporting Information:</b> NB, NS, &amp; PEI all have Acts protecting endangered species PEFC Wood Procurement processes Company risk assessments Wood Producer Information Packages</p>
Evidence Reviewed	PEFC Wood Procurement processes, Best Management Practices, Local and National Legislation Requirements
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

Comment or Mitigation Measure	
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	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	<p><b>New Brunswick</b> Regional forests have implemented Best Management Practices (BMPs) that ensure that biodiversity is protected. BMP's are supplied to private woodlot owners through the Regional Marketing Boards. A supplier specific risk assessment is completed and included with every contract to determine whether a site specific inspection will be completed. Furthermore, the marketing boards complete annual audits on a selection of their primary wood private woodlot suppliers. These data are summarized in an annual report.</p> <p>Computer based modelling software is used to create maps of forest inventory data. These maps show Eco regions, species present and include areas which are considered more vulnerable, including sites of endangered species, waterways, deer wintering areas and old-spruce forests. These maps are used in the management plans to ensure that biodiversity of the Crown forest is maintained.</p> <p><b>Nova Scotia</b> In NS, the Nova Scotia's Code of Forest Practice states that forest management will be designed and conducted in a manner that maintains and enhances the quality of air, water, and soil. The Watercourse and Wildlife Habitat Protection Regulations require that on Crown and Private lands that buffer strips must be left along watercourses, legacy trees must be left in clumps, and coarse woody debris must be left in all types of forest harvesting and management activities. In Nova Scotia, BMP's are provided to private woodlot owners through regional organizations who assist private woodlot owners in their forests' management.</p> <p><b>Prince Edward Island</b> The PEI Model Forest Network Partnership, working adjunct to the Nova Forest Alliance, seeks to improve the quality, size and biodiversity of PEI forests. The organization offers programs and services that help enhance awareness of sustainable forest management. The PEI Department of Environment, Energy and Forestry is an associate member of the Nova Forest Alliances. The Nova Forest Alliance provides a Best Management Practices Manual to all members as a tool to follow the principles of Forest Stewardship.</p>
Means of Verification	<p><b>Supporting Information:</b> Wood Procurement processes Company risk assessments Wood Producer Information Packages Company specific utilization standards</p>
Evidence Reviewed	SFI Wood Procurement processes, Best Management Practices, Local and National Legislation Requirements
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.2.6	The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	<p><b>New Brunswick</b> Regional forests have implemented Best Management Practices (BMPs) for Soil, Water, Ecological, Geological, Historical, Cultural, Wildlife, Biodiversity and Special Sites. BMP's are supplied to private woodlot owners through the Regional Marketing Boards. A supplier specific risk assessment will be completed and included with every contract to determine whether a site specific inspection will be completed. Furthermore, the marketing boards complete annual audits on a selection of their primary wood private woodlot suppliers. These data are summarized in an annual report. Adherence to the Clean Water Act, Watercourse Buffer Zone Guidelines is also required in both private and Crown forests in NB.</p> <p><b>Nova Scotia</b> Nova Scotia's Code of Forest Practice states that forest management will be designed and conducted in a manner that maintains and enhances the quality of air, water, and soil. The Watercourse and Wildlife Habitat Protection Regulations require that on Crown and Private lands that buffer strips must be left along watercourses, legacy trees must be left in clumps, and coarse woody debris must be left in all types of forest harvesting and management activities. In Nova Scotia, BMP's are provided to private woodlot owners through regional organizations who assist private woodlot owners in their forests' management.</p> <p><b>Prince Edward Island</b> The Wetland Policy for PEI works with the existing legislation, regulations and policies to protect wetlands. All wetlands are protected under section 10 of the Environmental Protection Act to ensure that there is no net loss of wetlands and wetland function.</p>
Means of Verification	<b>Evidence:</b> Supplier Risk Assessments through Regional Marketing Boards Local and National Legislation Requirements
Evidence Reviewed	Supplier Risk Assessments, Local and National Legislation Requirements
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	<p>Equipment used to harvest and generate biomass is regularly inspected and maintained. This includes the use of modern engine designs and the changing of air filters at specified periods.</p> <p>Each province (NB, NS, and PEI) carry out their own air quality monitoring programs.</p>



	<p><b>New Brunswick</b> The Department of the Environment and Local Government continuously monitor a variety of air pollutants at over 100 locations throughout the province. All industries are required to take steps to cut their emissions when levels begin to approach provincial standards and/or national guidelines.</p> <p><b>Nova Scotia</b> The NS provincial government also has air monitoring stations set up throughout the province. These are compared against the Maximum Permissible Ground Level Concentrations in the Nova Scotia Air Quality Regulations and the Canadian Ambient Air Quality Standards.</p> <p><b>Prince Edward Island</b> PEI has ongoing air quality monitoring programs at three different locations throughout the province. Annual air quality reports are available. PEI Air Quality Regulations are enforced by the Provincial Government.</p>
Means of Verification	<b>Evidence:</b> Canada's Clean Air Act
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	<b>Indicator</b>
<b>2.2.8</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	Provincial governments ensure that there is control over the use of chemicals and that proper pest management techniques are employed within each province.
Means of Verification	Supporting Evidence: NB – Pesticide Control Act NS – Pesticide Regulations under the Environment Act PEI – PEI Pesticide Control Act
Evidence Reviewed	Review of Provincial Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	<b>Indicator</b>
<b>2.2.9</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).

Finding	Each province requires spills of hazardous substances and environmental contaminants to be reported as soon as possible. The spill response is evaluated and it is determined whether further action/follow-up or fines are required. In New Brunswick, all spills must be reported to the provincial government. In Nova Scotia, authorities must be notified if the unauthorized release of contaminants is greater than pre-determined level. In PEI, spills are reported to the Environmental Emergency Response Team with the Department of Communities, Land and Environment. Each province also has a spill reporting hotline.
Means of Verification	<b>Supporting evidence:</b> Provincial legislation
Evidence Reviewed	Review of Provincial Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	<p><b>Nova Scotia</b> NSDNR have been collecting data on volume of forest harvest and secondary forest products for 60 years, which is reported in the NS forest production survey. NSDNR opted for a more detailed data collection system and implemented the NS Registry of Buyers. Furthermore, NSDNR’s forest inventory program collects inventory data via photo Interpretation and Permanent Forest Inventory Plots. Data analysis is used to define and track many forest components, such as volume and growth. The data also provides a basis for modelling volume, biomass and carbon. The Timber Management Group through NSDNR collect data on forest resources such as how they are affected by silviculture and harvesting via trials, experiments and surveys. The Spatially Related Forest Resources information system which shows forest stand descriptions, ownership, wildlife habitat and wetlands information, and natural and protected areas.</p> <p><b>New Brunswick</b> Forest Development Surveys provide quantitative stand data such as volume, density, and age by individual species. Licensee-managed changes to the forest are updated annually to track the implementation of the long term forest management plan. In harvesting, a variety of techniques are used (i.e. uneven-aged management) to ensure the long term sustainability of the forest. Licensees are responsible for ensuring that they do not exceed the annual allowable cut. The annual reports submitted to NBDNR summarize the harvest by forest zone and annual volume harvested. After 5 years and 10 years, a status of plantations and naturally regenerating areas including species mix, average tree height are determined.</p> <p><b>Prince Edward Island</b> The Forest Management Act requires the Department of Agriculture and Forestry to complete a state of the forest report every 10 years. The State of the Forest Report was published in 2013, and makes use of PEI’s Corporate Land Use Inventory. Combined with aerial photography, interpretation and ground plots, the Land Use</p>

	Inventory is updated every 10 years. PEI is the first province to have completed a second comprehensive inventory allowing them to observe changes and trends over time. The report evaluates forest growth and inventory and reports on wood supply shortfalls or surpluses.
Means of Verification	<b>Evidence:</b> Provincial government research
Evidence Reviewed	Review of Provincial Government Research and Best Management Practices
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.3.2</b>	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	All staff and contractors are trained to ensure they are aware and competent. The operations identify environmental and sustainable forestry training needs for employees and contractors to ensure that individuals performing tasks which can cause significant environmental impacts are competent on the basis of appropriate education, training and / or experience.
Means of Verification	<b>Evidence:</b> Sub-Contractor Agreements Training programs Electronic training records
Evidence Reviewed	Sub-contractor agreements, training program & matrix
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.3.3</b>	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	The work force is hired locally in the adjoining communities where the pellet milling plants are located. Wherever possible, equipment, supplies and other resources are also sourced locally. The facility also contributes to the communities in the form of municipal taxes.
Means of Verification	<b>Evidence:</b> Employee addresses Tax Bill Account Payables Supplier listings
Evidence Reviewed	Supplier list, distance to suppliers

Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.4.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	<p><b>Nova Scotia</b> The Forest Protection Division helps to maintain the health of Nova Scotia's woodlands by protecting them from pests and fires. The Forest Health section (advice and management of pests), Risk Services section (Provincial Forest Protection program), Wildfire Management section (Wildfire management) all work together to maintain forest health in Nova Scotia. The Forests Act was implemented to develop a healthy productive forest capable of yielding high volumes of high quality product. The Act is targeted to both private woodlot owners and Crown lands in the province. The provincial government is responsible for ensuring the enforcement of these acts.</p> <p><b>New Brunswick</b> Forest health and vitality are monitored through the provincial government. They determine the annual allowable cut for Crown and private woodlots based on ongoing research. Aerial photography and forest plots are used to chart the timber's growth and yields. These are updated annually using a computerized Geographical Information System (GIS). The Marketing Boards in New Brunswick assist private woodlots owners with timber inventory, harvest layout, and forest management plan development. The board also offers programs that help improve the management of private woodlots.</p> <p><b>Prince Edward Island</b> The Forest Management Act requires the Department of Agriculture and Forestry to complete a state of the forest report every 10 years. The State of the Forest Report was published in 2013, and makes use of PEI's Corporate Land Use Inventory. Combined with aerial photography, interpretation and ground plots, the Land Use Inventory is updated every 10 years. PEI is the first province to have completed a second comprehensive inventory allowing them to observe changes and trends over time. The report evaluates forest growth and inventory and reports on wood supply shortfalls or surpluses.</p>
Means of Verification	<p><b>Evidence:</b> NB SIC Survey New Brunswick – New Approaches for Private Woodlots <a href="http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/NewApproachesForPrivateWoodlots.pdf">http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/NewApproachesForPrivateWoodlots.pdf</a> New Brunswick – A balanced management approach for New Brunswick's Crown Forest <a href="http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/BMAF.pdf">http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/BMAF.pdf</a> Nova Scotia – Registry of Buyers annual report <a href="http://novascotia.ca/natr/forestry/registry/ann_report.asp">http://novascotia.ca/natr/forestry/registry/ann_report.asp</a></p>
Evidence Reviewed	NB SIC Survey

Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p><b>Nova Scotia</b> The Forest Protection Division helps to maintain the health of Nova Scotia's woodlands by protecting them from pests and fires. The Forest Health section (advice and management of pests), Risk Services section (Provincial Forest Protection program), Wildfire Management section (Wildfire management) all work together to ensure that fires, pests and diseases are managed properly.</p> <p><b>New Brunswick</b> Forest fires, pests and diseases are monitored through the provincial government. The Department of Natural Resources' Forest Pest Management Group is responsible for protecting New Brunswick's forests from insects and disease. The group have a forest pest management program that acts as an effective detection, monitoring and forecasting system. Forest fires are monitored through DNR's Forest Fire Watch. Furthermore, New Brunswick has an online reporting system for the public to report forest pests, disease or damage.</p> <p><b>Prince Edward Island</b> PEI's Forests, Fish and Wildlife Division with the Provincial Government ensure appropriate fire management. Burning permits are required for all outdoor fires during the fire season. Some municipalities have their own fire regulations and burning permits are not issued for those areas. PEI's Invasive Species Council (PEIISC) is a non profit group with the goal of managing invasive species that threaten PEI's environments. The group encourages the public, government and industry to become active in the prevention, detection and eradication of invasive species. PEI's State of the Forest Report also reports on fire, disease and pests over a ten year period.</p> <p>Areas with known diseases, pests or invasive species are monitored. These areas are regulated and restrictions apply on the movement of wood from these areas to non-regulated areas (Canadian Food Inspection Agency).</p>
Means of Verification	<p><b>Evidence:</b> NB SIC Survey New Brunswick – New Approaches for Private Woodlots <a href="http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/NewApproachesForPrivateWoodlots.pdf">http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/NewApproachesForPrivateWoodlots.pdf</a> New Brunswick – A balanced management approach for New Brunswick's Crown Forest <a href="http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/BMAF.pdf">http://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/BMAF.pdf</a> Nova Scotia – Registry of Buyers annual report <a href="http://novascotia.ca/natr/forestry/registry/ann_report.asp">http://novascotia.ca/natr/forestry/registry/ann_report.asp</a> PEI Burning permits: <a href="https://www.princeedwardisland.ca/en/information/communities-land-and-environment/burning-permits">https://www.princeedwardisland.ca/en/information/communities-land-and-environment/burning-permits</a> PEI State of the Forest Report:</p>

	<a href="http://www.gov.pe.ca/photos/original/2010StateFrstrp.pdf">http://www.gov.pe.ca/photos/original/2010StateFrstrp.pdf</a>
Evidence Reviewed	NB SIC Survey, Applicable Provincial Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.4.3</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	The risk of illegal logging is negligible across Canada, regardless of the region. Strong legislation is in place in NB, NS, and PEI to ensure the scaling and transportation of logs and wood fibre is documented.  Company contracts state that wood fibre does not originate from controversial sources i.e. illegal or unauthorized sources. Where a company harvests from Crown lands it is responsible to pay the Crown a predetermined stumpage rate.
Means of Verification	<b>Evidence:</b> <a href="http://www.sfmcanada.org/en/forest-products/legal-forest-products">http://www.sfmcanada.org/en/forest-products/legal-forest-products</a> Company Risk Assessment Supplier assertions NB SIC Survey Transportation Certificates NS Registry of Buyers
Evidence Reviewed	NB, NS, and PEI Risk Assessments, Supplier Assertions, NB SIC Survey, Transportation Certificate
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.5.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	The Canadian Charter of Rights and Freedoms forms the first part of the Constitution Act (1982). The bill guarantees certain political rights of Canadian Citizens and civil rights to everyone in Canada. Aboriginal rights, like treaty rights, are recognized by Section 35 of the Constitution Act. Historically, Aboriginal rights have been achieved by way of treaty or land claims settlement rather than through legislation.  The new Aboriginal Forestry Initiative (AFI) is the federal government's approach to enhance aboriginal participation in Canada's forest sector. The AFI is supported by Natural Resources Canada and Aboriginal Affairs and Northern Development Canada.  There is no evidence of violations of the ILO Convention 169 on Indigenous and

	Tribal Peoples taking place in the forested area of this risk assessment according to Amnesty International.
Means of Verification	<b>Evidence:</b> <a href="http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm">http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm</a> <a href="http://www.nafaforestry.org/pdf/2015/First%20Nation-Held%20Forest%20Tenure%20Report%202015.pdf">http://www.nafaforestry.org/pdf/2015/First%20Nation-Held%20Forest%20Tenure%20Report%202015.pdf</a> <a href="http://www.nrcan.gc.ca/forests/federal-programs/13125">http://www.nrcan.gc.ca/forests/federal-programs/13125</a>
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	Canada has an extensive system of forest governance with negligible incidence of suspicious log activity. Canada is renowned for its world class forest practices and is recognized internationally as a leader in sustainable forest management. Forest activities are planned and monitored in an open and transparent manner (from <a href="http://www.sfmcanada.org/images/Publications/EN/Illegal_Logging_EN.pdf">http://www.sfmcanada.org/images/Publications/EN/Illegal_Logging_EN.pdf</a> ).
Means of Verification	Supporting Information: Company risk assessments Provincial and Federal Legislation
Evidence Reviewed	NB, NS, and PEI Risk Assessments, NB SIC Survey
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	89% of Canada's land area is Crown land (Federal & Provincial), and 11% are privately owned. The Federal and provincial governments regulate the tenure & use rights and forest management practices on their land.  Private land tenure is regulated through provincial acts and regulations (NB's Land Titles Act, NS's Land Registration Act, and PEI's Registry Act). Private land use rights are regulated by the Provincial acts and municipal bylaws (NB's Community Planning Act, NS Municipal Government Act, PEI's Land's Protection Act).

	The Biomass Producer has an Employee Safety Orientation, which includes a review of employee rights and health and safety regulations.
Means of Verification	Provincial and Federal Legislation, BP's Safety Orientation program, EMS Manual
Evidence Reviewed	EMS Manual, BP's Safety Orientation Program
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	Rights to Freedom of Association and to collective bargaining are protected under the Canadian Charter of Rights
Means of Verification	<b>Supporting evidence:</b> Provincial and Federal Employment Standard Acts and labour codes Canadian Charter of Rights
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	Human Resources staff implements company policies to ensure employment standards are complied with. Forest employment in Canada is regulated under federal and provincial labour codes to provide for a safe and healthy workplace, protect workers' rights to organize and are consistent with the ILO provisions.
Means of Verification	<b>Supporting evidence:</b> Provincial and Federal Employment Standard Acts and labour codes. Company Human Resource Manuals and Policies e.g. Minimum Age Requirements <a href="http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm">http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm</a> <a href="http://www.labour.gc.ca/eng/standards_equity/">http://www.labour.gc.ca/eng/standards_equity/</a> <a href="http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/">http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/</a> <a href="http://www.cic.gc.ca/english/work/labour-standards.asp">http://www.cic.gc.ca/english/work/labour-standards.asp</a>
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>



Comment or Mitigation Measure	
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	Indicator
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	Forest employment in Canada is regulated under federal and provincial labour codes which prohibit child labour, provide for a safe and healthy workplace, protect workers' rights to organize and are consistent with the ILO provisions. There is no evidence of child labour violations.
Means of Verification	<b>Supporting evidence:</b> Provincial and Federal Employment Standard Acts and labour codes Company Human Resource Manuals and Policies e.g. Minimum Age Requirements <a href="http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm">http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm</a> <a href="http://www.labour.gc.ca/eng/standards_equity/">http://www.labour.gc.ca/eng/standards_equity/</a> <a href="http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/">http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/</a> <a href="http://www.cic.gc.ca/english/work/labour-standards.asp">http://www.cic.gc.ca/english/work/labour-standards.asp</a>
Evidence Reviewed	Review of Provincial & Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	Forest employment in Canada is regulated under federal and provincial labour codes which prohibit child labour, provide for a safe and healthy workplace, protect workers' rights to organize and are consistent with the ILO provisions. There is also no evidence of discrimination violations between the company's and their workers.
Means of Verification	<b>Supporting evidence:</b> Provincial and Federal Employment Standard Acts and labour codes Company Human Resource Manuals and Policies e.g. Anti discrimination Policies <a href="http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm">http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm</a> <a href="http://www.labour.gc.ca/eng/standards_equity/">http://www.labour.gc.ca/eng/standards_equity/</a> <a href="http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/">http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/</a> <a href="http://www.cic.gc.ca/english/work/labour-standards.asp">http://www.cic.gc.ca/english/work/labour-standards.asp</a>
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	Forest employment in Canada is regulated under federal and provincial labour codes. Forest workers are protected by either federal (~10%) or provincial (~90%) laws. Employment standard laws protect the rights of workers in relation to work hours, pay rate, vacation, holidays, breaks, leaves of absences or termination.
Means of Verification	<b>Supporting evidence:</b> Provincial and Federal Employment Standard Acts and labour codes <a href="http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm">http://www.state.gov/g/drl/rls/hrrpt/2005/61719.htm</a> <a href="http://www.labour.gc.ca/eng/standards_equity/">http://www.labour.gc.ca/eng/standards_equity/</a> <a href="http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/">http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._986/</a> <a href="http://www.cic.gc.ca/english/work/labour-standards.asp">http://www.cic.gc.ca/english/work/labour-standards.asp</a>
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	Provincial occupational health and safety regulations are in place in PEI, NB & NS that ensure the health and safety of forest workers.
Means of Verification	Occupational Health and Safety Regulations
Evidence Reviewed	Company health and safety program, Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	Wood fibre is not sourced from wetlands, peatlands, riparian reserve zones or protected areas. All harvesting is regulated by provincial forestry regulations which have stringent controls to ensure the protection of areas deemed to have high carbon stocks.

Means of Verification	Provincial and Federal Legislations
Evidence Reviewed	Review of Provincial and Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.9.2</b>	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	Reforestation is mandated for all crown lands within each of the provinces and the company's supply areas.
Means of Verification	Evidence: NB SIC Survey Acts & Regulations Best Management Practices
Evidence Reviewed	NB SIC Survey, Review of Provincial and Federal Legislation, Best Management Practices
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.10.1</b>	Genetically modified trees are not used.
Finding	The Food and Agricultural Organization of the United Nations summarizes that no GMO trees are used commercially in Canada. Genetically engineered forest trees are not approved for commercial plantings in Canada. Federal Food Inspection Agency confirms that confined field trials of Plants with Novel Traits are limited to scientific research.
Means of Verification	Federal Legislation
Evidence Reviewed	Review of Federal Legislation
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	