



Supply Base Report: Shaw Resources (A Division of The Shaw Group Limited) - Belledune

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Completed in accordance with the Supply Base Report Template Version 1.3

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

Document history

Version 1.0: published 26 March 2015

Version 1.1 published 22 February 2016

Version 1.2 published 23 June 2016

Version 1.3 published 14 January 2019; re-published 3 April 2020

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1 Overview

Producer name: Shaw Resources (A Division of The Shaw Group Limited) - Belledune
 Producer location: 52 Hodgins Road, Belledune, NB, E8G 2E3
 Geographic position: Latitude 47.9058, Longitude -65.8670, Datum 1983
 Primary contact: Julie Griffiths
 P.O. Box 60, Shubenacadie, NS, B0N 2H0
 902 750 0173
jgriffiths@shawresources.ca
 Company website: www.shawresources.ca
 Date report finalised: March 9, 2017
 Close of last CB audit: October 2, 2019, Nova Scotia, Canada
 Name of CB: SCS Global Services
 Translations from English: No
 SBP Standard(s) used: SBP Standard 1: Feedstock Compliance Standard (V1.0)
 SBP Standard 2: Verification of SBP-compliant Feedstock (V1.0)
 SBP Standard 4: Chain of Custody (V1.0)
 SBP Standard 5: Collection and Communication of Data (V1.0)
 Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>
 SBP Endorsed Regional Risk Assessment: N/A
 Weblink to SBE on Company website: <https://shawresources.ca/about-shaw/why-shaw/>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Shaw Resources - Belledune manufactures industrial wood pellets for export to European power utilities. The supply base is considered New Brunswick (NB), south-eastern Québec (QC), and Nova Scotia (NS). Primary feedstock (round wood) and secondary feedstock (sawmill residuals) are used in the production of wood pellets in Belledune.

New Brunswick Forestry

In New Brunswick, the forest industry has been described as one of the province's biggest economic drivers, creating 24,000 jobs with 600 forest companies, and more than 2500 in the supply chain. Forest products are one of the top private GDP generators in New Brunswick (Economic Impacts of the NB Forest Sector, 2016).

The Crown Lands and Forests Act (1982) is the legal foundation for Crown forest management in New Brunswick. Crown land is divided into 10 timber licences, and each license is leased through a 25 year forest management agreement to a large forest based company called a Licensee. On a 5 year cycle, the New Brunswick Department of Natural Resources (NBDNR) will re-assess the forest management practices, and if satisfied, will renew the agreement for another 5 year period. Licensees are required to have a forest management plan that covers a 25 year period that are sustainable for an 80 year planning horizon. The licensees' annual operating plans are reviewed to ensure that all regulations and standards are followed. All forest operations on Crown land are ISO 14001 certified and certified to a sustainable Forest Management System (i.e. CSA, FSC, and SFI). NB is one of the first jurisdictions in the world to require certification of licensee operations.

The provincial government sets the annual allowable cut (AAC) for both Crown and private woodlots based on on-going forest inventory research. Data obtained from aerial photography analysis and ground sample plots chart the province's timber growth and yield. These are updated on an annual cycle using a computerized geographical information system (GIS).

Harvesting from private forest sources is monitored through 1 of 7 regional marketing boards. The marketing boards offer assistance to private woodlot owners with forest management planning; this includes calculating timber inventory, defining harvest layout, and developing management plans to name a few. The marketing boards will also offer programs that promote sustainable forest management. The provincial government partners with private woodlot owners and marketing boards to fund silviculture treatments. Landowner Agreements must be signed with the provincial government to be eligible for silviculture treatment on private woodlots. Woodlots may be inspected to ensure best management practices and guidelines outlined in the New Brunswick Private Woodlots Silviculture Manual (Natural Resources and Energy Development, 2018) are being followed.

Quebec Forestry

With the implementation of Quebec's Sustainable Forest Development Act in 2010, the provincial government has greater control and responsibility over Crown forest management. This includes maintaining ecosystem-based management plans that maintain ecosystem biodiversity and viability. The MRN offers

technical and financial support to woodlot owners that practice sustainable forest management. This support is presented through regional agencies (similar to regional marketing boards in NB) that help with the preparation of protection and development plans. Only certified private forests have access to these government programs.

About 92% of Quebec's forests are publicly owned and 8% are private. By August 2017, 93% of the province's publicly managed forests were SFM certified (FSC or SFI). The Federation of Forest Producers of Québec (Fédération des producteurs forestiers du Québec, FPFQ) is the provincial organization that promotes the interests of the 130,000 private woodlot owners, which includes 35,000 forest producers. There are 13 regional agencies that help to promote the protection and enhancement of Québec's private forests. Municipal by-laws regulate cutting of trees to limit the size of cut blocks and protect riparian zones and sensitive environments. Permits for logging on private lands are required in all municipalities. The Civil Code of Québec provides recourse for logging performed on private property without the consent of the landowner.

Nova Scotia Forestry

The Nova Scotia Department of Natural Resources (NSDNR) has the authority over Crown forests in Nova Scotia. They monitor and enforce activities to prevent unauthorized harvest. Harvesting companies with Crown allocations must pay stumpage royalties for the timber products that they harvest. However, the majority of primary wood products supplied to industry in Nova Scotia are from privately owned woodlots. The provincial government has developed forest management strategies to encourage and assist private woodlot owners to manage their land effectively.

The Nova Scotia Registry of Buyers is where businesses and individuals report on the primary forest products that they've acquired for processing. The registry helps to build reliable data to understand wood demand, estimate sustainable harvest levels, and assist with long-term forest management in Nova Scotia. Registered buyers also contribute to a silviculture program (Sustainable Forest Fund) based on a rate per volume basis. Silviculture and training programs encourage the sustainable use of Nova Scotia Forests. At the current state, harvest levels on Crown, industrial and private lands are sustainable.

Nova Scotia's Code of Forest Practice are the guidelines for sustainable forest management, which are mandatory on Crown lands (administered by NSDNR), and highly encouraged on private woodlots in Nova Scotia. The Code is implemented through various provincial and federal legislation and regulations. The Nova Scotia Forests Act was implemented to develop a healthy productive forest capable of yielding high volumes of high quality product and is directed towards both private woodlot owners and Crown lands in the province. The enforcement division of NSDNR completes regular visits to areas being harvested on both Crown and private lands to ensure that both the Forests Act and the Crown Lands Act are adhered to.

Forestry is a big economic driver in Nova Scotia, employing 11,500 Nova Scotians directly and indirectly. In 2015, the Nova Scotia forest industry generated over \$2 billion in economic impact (NS Forest Industry Economic Impact, 2016). The three major export producers are pulp and paper, wood-fabricated materials, and primary wood products (https://novascotia.ca/natr/forestry/reports/State_of_the_Forest_2016.pdf).

The harvest of primary forest products in Nova Scotia are primarily for sawmills (53%), pulp mills (34%), and energy generation (~6%) (Registry of Buyers Report, 2020). Wood pellets are generally made from secondary forest products that would have normally been wasted: sawmill residues (sawdust and shavings) and low-grade timber from harvest sites that have no other economic value. The primary source for fibre at the Eastern Embers plant is sawmill residuals. The scale of wood pellet operations is usually dependent on

the availability of fibre sources; however pellet plants in Eastern Canadian provinces have an annual production in the range of 50,000 to 100,000 mt/yr.

Economically, the Belledune pellet plant is an important part of the forest products supply chain; it directly employs over 20 local workers and employs many others indirectly (i.e. local contractors and tradespeople).

There are currently no tree species listed in CITES found in Nova Scotia, New Brunswick, or Prince Edward Island.

All product used at the Belledune wood pellet plant can be defined in 4 categories: 1) Certified SBP-Compliant Primary Feedstock, 2) Uncertified SBP-Compliant Primary Feedstock, 3) Certified SBP-Compliant Secondary Feedstock, and 4) Uncertified SBP-Compliant Secondary Feedstock (Table 1).

Belledune Feedstock (2020)				
Feedstock Product Groups	% of Certified Feedstock	% of Uncertified Feedstock	# of Suppliers	Species Mix
Controlled Feedstock				
SBP-Compliant Primary Feedstock	24%	20%	3-6	(See 2.5c, below)
SBP-Compliant Secondary Feedstock	36%	20%	6-8	(See 2.5c, below)
SBP-Compliant Tertiary Feedstock				
SBP Non-Compliant Feedstock				

2.2 Actions taken to promote certification amongst feedstock supplier

Suppliers recognize that Shaw Resources - Belledune is certified to PEFC chain of custody and Sustainable Biomass Program standards. Sustainability is a common practice amongst many of Shaw Resources’ current suppliers of Shaw Resources; suppliers continue to seek third party SFM certifications (FSC, or SFI) where possible. Shaw Resources’ sustainability mission statement is publicly available and is posted on the company website. Shaw Resources’ mission statement is:

“Shaw Resources PEFC COC (Programme for the Endorsement of Forest Certification, Chain of Custody) program exists to support our customers’ requirements for a socially responsible and sustainable, renewable energy source. It reflects Shaw Resources’ commitment to providing its employees with a safe environment to work and to ensuring the sustainability of the natural resources used and the protection of the environment of the regions that the Shaw Resources wood pellet plants operate in.”

Suppliers are asked to sign quarterly supplier declarations and scoping-in agreements as part of the PEFC chain of custody certification. Furthermore, all suppliers are required to sign a supplier's assertion, which declares that feedstock originates from within the defined supply base and is not from controversial sources.

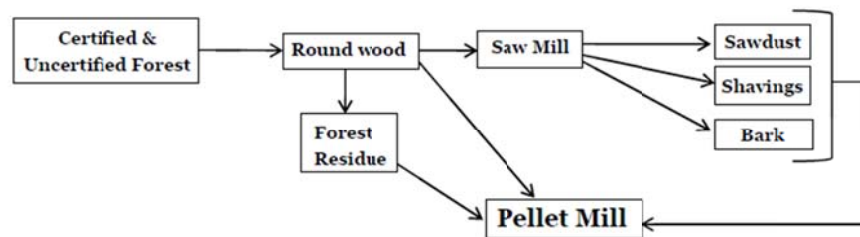
Shaw Resources has implemented training programs company-wide to ensure that employees understand objectives of each of the certifications. Shaw Resources has a sustainability mission statement that is publicly available and posted on the company website.

2.3 Final harvest sampling programme

Belledune's primary forest products originate from: a) Crown forest and b) private forest sources.

Crown land forest management is monitored and enforced by NBDNR. Regional marketing boards represent private forest woodlot owners. Regional marketing boards complete surveys on a random selection of private woodlots chosen by the New Brunswick SFI Implementation Committee (NBSIC) on an annual basis. These surveys are compiled by NBSIC and available as an annual report.

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]



2.5 Quantification of the Supply Base

New Brunswick Supply Base

a. *Total Supply Base Area (ha): Cumulative forest area of all forest types within SB*
6,100,000 ha

b. *Tenure by type (ha): Privately owned/Public/Community concession*
3,200,000 ha of forest lands are public and 2,900,000 ha are private.

c. *Forest by type (ha): Boreal/Temperate/Tropical*
The forest type is **Acadian**. Common species include spruce, balsam fir, white pine, maple and birch.

d. *Forest by management type (ha): Plantation/Managed Natural/Natural*
Natural management

e. *Certified forest by scheme (ha): Hectares of FSC or PEFC certified*
4,200,000 ha are certified to the SFI.

Nova Scotia Supply Base

a. *Total Supply Base Area (ha): Cumulative forest area of all forest types within SB*
4,275,000 ha

b. *Tenure by type (ha): Privately owned/Public/Community concession*
1,994,000 ha (47%) of forest lands are public and 2,281,000 ha (53%) are private.

c. *Forest by type (ha): Boreal/Temperate/Tropical*
Acadian

d. *Forest by management type (ha): Plantation/Managed Natural/Natural*
Natural management

e. *Certified forest by scheme (ha): Hectares of FSC or PEFC certified*
1,300,000 ha are certified (FSC/SFI)

Prince Edward Island Supply Base

a. *Total Supply Base Area (ha): Cumulative forest area of all forest types within SB*
250,084 ha

b. *Tenure by type (ha): Privately owned/Public/Community concession*
33,011 ha of forest lands are public and 217,073 ha are private.

c. *Forest by type (ha): Boreal/Temperate/Tropical*
Acadian

d. *Forest by management type (ha): Plantation/Managed Natural/Natural*
Natural management

e. *Certified forest by scheme (ha): Hectares of FSC or PEFC certified*
616 ha are certified to the FSC.

Feedstock

f. Total volume of Feedstock: tonnes or m3

0-200,000 tonnes

g. Volume of primary feedstock:

0-200,000 tonnes

h. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

40-59% of primary feedstock originates from large forest holdings certified to an SBP-approved Forest Management Schemes (primarily SFI Forest Management, which is endorsed through PEFC and SFI Chain of Custody)

0-19% of primary feedstock originates from large forest holdings not certified to an SBP-approved Forest Management Schemes

40-59% of primary feedstock originates from small forest holdings not certified to an SBP-approved Forest Management Schemes. List all species in primary feedstock, including scientific name

i. List all species in primary feedstock, including scientific name

Beech (Fagus sp.)

Poplar (Populus sp.)
Hemlock (Tsuga sp.)
Ash (Fraxinus sp.)
Birch (Betula sp.)
Maple (Acer sp.)
Aspen (Populus sp.)
Balsam Fir (Abies Balsamea)
Spruce (Picea sp.)
Cedar (Cedrus sp.)
Pine (Pinus sp.)

j. Volume of primary feedstock from primary forest

Primary feedstock is sourced from continuously managed secondary forests

k. List percentage of primary feedstock from primary forest (j), by the following categories.

No primary forest feedstock is used

l. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

40-59% of secondary feedstock (sawmill residuals) originate from New Brunswick, Nova Scotia and Quebec.

m. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

There is no tertiary feedstock

* Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands for (f) and (g) are:

1. 0 – 200,000 tonnes or m³
2. 200,000 – 400,000 tonnes or m³
3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³

Bands for (h), (l) and (m) are:

1. 0%-19%
2. 20%-39%
3. 40%-59%
4. 60%-79%
5. 80%-100%

NB: Percentage values to be calculated as rounded-up integers.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
<input checked="" type="checkbox"/>	<input type="checkbox"/>

It was determined that a Supply Base Evaluation (SBE) was required because Shaw resources – Belledune will use the SBP-compliant claim when selling product and not all feedstock is certified to an SBP-approved certification scheme. As part of the supply base evaluation, a stakeholder’s consultation was completed to allow stakeholders an opportunity to identify any foreseeable risks within the supply base.

4 Supply Base Evaluation

4.1 Scope

The scope of the SBE includes the supply base for all primary and secondary feedstock sources. The supply base includes New Brunswick, Nova Scotia and Quebec. To ensure that all secondary feedstock originates from within the supply base, a 100-km radius around each of our secondary feedstock suppliers was examined to ensure it was within the supply base.

4.2 Justification

All roundwood, biomass and residuals originate from within New Brunswick, Nova Scotia and Quebec. The approach used in evaluating the supply base relied heavily on government (federal and provincial) legislation, regulations, and third party certification standards. Government enforcement divisions carry out regular monitoring and site visits to ensure all legislation and regulations are enforced. Furthermore, penalties are administered for non-compliance.

4.3 Results of Risk Assessment

The SBE indicated a low risk of non-compliance to the SBP standards.

4.4 Results of Supplier Verification Programme

Since the entire supply base is low risk, there was no need to complete a supplier verification programme.

4.5 Conclusion

The SBE assesses the risk in the company's defined supply base (New Brunswick, Nova Scotia and Quebec). The SBP Standard 1 – Feedstock Standard's aim is to assure end users that feedstock is legally and sustainably sourced. SBP-approved FM certified feedstock is considered SBP-compliant. Feedstock from sources that are not SBP-compliant FM-certified required verification that the supply was low risk so that it could be considered SBP-compliant.

The SBE for Shaw Resources-Belledune involved a detailed assessment and evaluation of the Belledune feedstock supply base. Ultimately, the SBE indicated an overall low risk to all indicators and defined supply base is considered SBP-compliant.

5 Supply Base Evaluation Process

The SBE process involved a detailed review of all feedstock sources within a particular region; and for the Belledune facility included New Brunswick, Nova Scotia and Quebec as regional sources. The New Brunswick Department of Natural Resources, the North Shore Forestry Marketing Board, the Forest Sector from the Department of Environment in Quebec, and the Nova Scotia Department of Natural Resources were all consulted in the evaluation process.

6 Stakeholder Consultation

As part of the stakeholder consultation, the SBE document and a link to the standards was emailed to each of the regional stakeholders. Stakeholders were requested to respond within 30 days with any comments/questions. The consultation was completed on October 31, 2020. Stakeholders included provincial government bodies, environmental NGO, labour unions, and representatives of indigenous people, forest industries, local communities, and recreational industries.

6.1 Response to stakeholder comments

There were no comments received throughout the stakeholder process.

7 Overview of Initial Assessment of Risk

The results of the initial assessment of risk showed that all indicators were low risk.

Table 1 - Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		☑	
1.1.2		☑	
1.1.3		☑	
1.2.1		☑	
1.3.1		☑	
1.4.1		☑	
1.5.1		☑	
1.6.1		☑	
2.1.1		☑	
2.1.2		☑	
2.1.3		☑	
2.2.1		☑	
2.2.2		☑	
2.2.3		☑	
2.2.4		☑	
2.2.5		☑	
2.2.6		☑	
2.2.7		☑	
2.2.8		☑	
2.2.9		☑	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		☑	
2.3.2		☑	
2.3.3		☑	
2.4.1		☑	
2.4.2		☑	
2.4.3		☑	
2.5.1		☑	
2.5.2		☑	
2.6.1		☑	
2.7.1		☑	
2.7.2		☑	
2.7.3		☑	
2.7.4		☑	
2.7.5		☑	
2.8.1		☑	
2.9.1		☑	
2.9.2		☑	
2.10.1		☑	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

The SBE showed that the supply base was low risk, so a supplier verification programme was not required.

8.2 Site visits

N/A

8.3 Conclusions from the Supplier Verification Programme

N/A

9 Mitigation Measures

9.1 Mitigation measures

Mitigation measures were not required at this time as all feedstock was considered low risk in the SBE.

9.2 Monitoring and outcomes

N/A

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report



11.1 Peer review

The final version of the supply base report was reviewed by the Operations Manager for Shaw Resources - Belledune. A peer review was completed by Nate Ryant on January 19, 2016, consultant with the Wood Pellet Association of Canada.

11.2 Public or additional reviews

N/A

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Julie Griffiths, MSc, P.Geo</i>	<i>Geology/Environmental Specialist</i>	<i>January 4, 2020</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	[name]	[title]	[date]
	Name	Title	Date
Report approved by:	[name] 	<i>CEO + President</i>	<i>Jan 4, 2021</i>
	Name	Title	Date
Report approved by:	[name] 	<i>Corporate Secretary + Legal Counsel</i>	<i>Jan 4, 2021</i>
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

There are no significant changes in the Supply Base.

13.2 Effectiveness of previous mitigation measures

No mitigation measures are required.

13.3 New risk ratings and mitigation measures

All indicators remain low risk at this time.

13.4 Actual figures for feedstock over the previous 12 months

a. Total volume of Feedstock: tonnes or m³

0-200,000 Tonnes

b. Volume of primary feedstock: tonnes or m³

0-200,000 Tonnes

c. List percentage of primary feedstock (g), by the following categories

40-59% of primary feedstock originates from large forest holdings certified to an SBP-approved Forest Management Schemes (primarily SFI Forest Management, which is endorsed through PEFC and SFI Chain of Custody)

No primary feedstock originates from large forest holdings not certified to an SBP-approved Forest Management Schemes

No feedstock originates from small forest holdings certified to an SBP-approved Forest Management Schemes

40-59% of primary feedstock originates from small forest holdings not certified to an SBP-approved Forest Management Schemes

d. List all species in primary feedstock, including scientific name

The species list remains unchanged.

e. Volume of primary feedstock from primary forest

Primary feedstock is sourced from continuously managed secondary forests.

f. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:

There is no primary feedstock originating from primary forest.

g. Volume of secondary feedstock: specify origin and type

0-200,000 Tonnes. All secondary feedstock (sawmill residuals) originate from Nova Scotia, New Brunswick and Quebec.

h. Volume of tertiary feedstock: specify origin and composition

There is no tertiary feedstock.

13.5 Projected figures for feedstock over the next 12 months

a. Total volume of Feedstock: tonnes or m³

0-200,000 Tonnes

b. Volume of primary feedstock: tonnes or m³

0-200,000 Tonnes

c. List percentage of primary feedstock (g), by the following categories

40-59% of primary feedstock originates from large forest holdings certified to an SBP-approved Forest Management Schemes (primarily SFI Forest Management, which is endorsed through PEFC and SFI Chain of Custody)

No primary feedstock originates from large forest holdings not certified to an SBP-approved Forest Management Schemes

No feedstock originates from small forest holdings certified to an SBP-approved Forest Management Schemes

40-59% of primary feedstock originates from small forest holdings not certified to an SBP-approved Forest Management Schemes

d. List all species in primary feedstock, including scientific name

The species list will remain unchanged.

e. Volume of primary feedstock from primary forest

Primary feedstock is sourced from continuously managed secondary forests.

f. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:

There will be no primary feedstock originating from primary forest.

g. Volume of secondary feedstock: specify origin and type

0-200,000 Tonnes. All secondary feedstock (sawmill residuals) will originate from Nova Scotia, New Brunswick and Quebec.

h. Volume of tertiary feedstock: specify origin and composition

There will be no tertiary feedstock.

- * Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands are:

1. 0 – 200,000 tonnes or m³
2. 200,000 – 400,000 tonnes or m³
3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³