

**Forest Stewardship Council® (FSC®)
Controlled Wood**

**Due Diligence System (DDS)
Public Summary**

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Canada



2218-D Airport Drive, Campbell River
British Columbia, Canada V9H 0E2

www.zimmfor.com



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Introduction

Zimmfor Management Services Ltd. (Zimmfor) is a leader in providing consulting services to the resource management sector, with a focus on certification support related to forest management and chain of custody (CoC) for wood and wood fibre products.

In support of our participating client base (refer to Appendix 1), Zimmfor has developed a Due Diligence System (DDS) according to the requirements for Sourcing FSC Controlled Wood (CW) Standard (FSC-STD-40-005 V3-1).

FSC Controlled Wood supports the use of FSC Mix products and the establishes minimum legal, environmental, and social requirements for non-certified fibre that can be mixed in with FSC certified fibre.

The DDS consists of three elements:

- 1) Information Gathering – completed by clients using client specific “Supplier Declarations” or similar documents (e.g., Log Purchase Agreements; Timber Sale Contracts). Supplier Declarations provide information on products and species being sourced, geographic origins of timber harvesting, includes a commitment from the supplier to assist in completing audits, and confirmation of the legality of the wood being sourced.
- 2) FSC Controlled Wood Risk Assessment – the National Risk Assessment (NRA) for the Canada (version 1) was completed by the FSC Canada Regional Office and approved on June 26, 2019. Subsequently revised and approved November 5, 2019 (version 2).

Applicable source areas are client specific (refer to Appendix 1).

- 3) Risk Mitigation – where source areas or suppliers are deemed to be not-low, or Specified Risk, measures will be implemented to mitigate identified risks. Measures may include:
 - a) physical segregation of uncontrolled material,
 - b) exclusion of suppliers, supply areas, species, or products, or
 - c) implementation of Control Measures identified within the applicable Risk Assessment.

Applicable FSC Risk Assessment(s)

As of December 26, 2019, the FSC Canada National Risk Assessment (NRA) is the applicable Risk Assessment covering the provinces and territories in Canada. For clarity, the Zimmfor DDS transitions directly to version 2 of the NRA, effective December 26, 2019.

The Canadian NRA (versions 1 and 2) can be found at: <https://ca.fsc.org/en-ca/certification/controlled-wood>

There are no other applicable Risk Assessments related to these Canadian source areas for the participating Zimmfor clients.



Source Areas and Risk Designations

The source areas and risk designations applicable to risk assessed provinces in Canada are listed in Table 1 below.

Table 1: Risk Summary – Canada

Supply Areas	Overall Risk Rank by CW Category				
	1. Illegally Harvested Wood	2. Violation of Traditional or Civil Rights	3. HCVFs	4. Conversion	5. Genetically Modified Trees
<u>Alberta</u>	Low	Specified ¹	Specified ²⁷	Specified ²⁹	Low
<u>British Columbia</u>	Low	Specified ¹	Specified ^{4,7,15,16,17,19,20,21,22,24,25,26,27}	Specified ²⁸	Low
<u>Manitoba</u>	Low	Specified ¹	Specified ²⁷	Low	Low
<u>New Brunswick</u>	Low	Specified ¹	Specified	Low	Low
<u>Nova Scotia</u>	Low	Specified ¹	Specified	Low	Low
<u>Ontario</u>	Low	Specified ¹	Specified ²⁷	Low	Low
<u>Prince Edward Island</u>	Low	Specified ¹	Low	Low	Low
<u>Quebec</u>	Low	Specified ¹	Specified ²⁷	Specified ³⁰	Low
<u>Saskatchewan</u>	Low	Specified ¹	Specified ²⁷	Low	Low

FSC Canada National Risk Assessment Risk Designation, by Risk Value

The following summary is taken from the FSC Canada NRA and presented in the table above for clarity. A detailed breakdown by risk value and ecoregion is available in the NRA.

CW Category 2 – Wood harvested in violation of traditional and human rights

Indicator 2.3 The rights of Indigenous and Traditional Peoples are upheld

1. All ecoregions

CW Category 3 – Wood from forests where high conservation values are threatened by management activities

Indicator 3.1 – Species Diversity

- | | |
|---|--|
| <ol style="list-style-type: none"> 2. Southern Great Lakes forest 3. Eastern Great Lake lowland forest 4. Central Pacific coastal forest 5. Eastern Canadian forest 6. New England Acadian forest 7. Puget Lowland forest 8. Eastern Canadian Shield taiga 9. Central Canadian Shield forests 10. Eastern forest-boreal transition 11. Midwestern Canadian Shield forest 12. Mid-Continental Canadian forests 13. Southern Hudson Bay taiga 14. Northern Canadian Shield taiga | <ol style="list-style-type: none"> 15. Canadian Aspen forests and parklands 16. Alberta-British Columbia foothills forests 17. Muskwa-Slave Lake forests 18. Northwest Territories taiga 19. Fraser Plateau and Basin complex 20. Northern transitional alpine forests 21. Central British Columbia Mountain forests 22. British Columbia mainland coastal forests 23. Northern Cordillera forests 24. Alberta Mountain forests 25. North Central Rockies forests 26. Okanagan dry forests |
|---|--|



Indicator 3.2 – Landscape-level ecosystems and mosaics

27. Specified Risk IFLs from NRA (Appendix III)

CW Category 4 – Wood from forests being converted to plantations or non-forest use

Indicator 4.1 - Net conversion of natural forests to plantations or non-forest use is less than 0.02% or 5000 hectares on average for the past 5 years

28. British Columbia Boreal Plains (RU 39)
29. Alberta Boreal Plains (RU 34)
30. Quebec Mixedwood Plains (RU 12)

Control Measures

For the fiber sourced from the areas with Specified Risk, summarized in Table 1 above, Control Measures (CM) have been implemented, as described below.

Controlled Wood (CW) Category 2 – Wood harvested in violation of traditional and human rights

Indicator 2.3 – The rights of Indigenous and Traditional Peoples are upheld.

There are no mandatory CM identified for this Indicator, however there are five recommended CM (pgs. 51-52). Consistent with CM #5, Zimmfor has developed a Dispute Resolution Process (DRP). Refer to the DDS Supplement for specifics.

Controlled Wood (CW) Category 3.1 – High Conservation Values (HCV)

Indicator 3.1 – Species Diversity

For all species (except woodland caribou), there are six potential Mandatory CM (NRA pg. 123-125). The Zimmfor DDS uses a combination of the following two CM:

- 1) CM 1 – Evidence demonstrates that:
 - harvesting does not take place in critical habitats* for Specified Risk species identified; OR
 - harvesting activities are consistent with the federally approved Action Plan or Range Plan; OR
 - harvesting is permitted through SARA (section 73 permit).

Evidence is reviewed annually, through review of the supply chain.

- 2) CM 5 (evidence demonstrates that actions are implemented within the sourcing area to mitigate the threats caused by forest activities to critical habitat* identified in the Federal Recovery Strategy).

Based on each client's confirmed sourcing, research has been summarized as to how forest management actions have mitigated the identified threats. Refer to the DDS Supplement for specifics.

For woodland caribou, there are four potential Mandatory CM (one specific to boreal population) (NRA pg. 125-126). The Zimmfor DDS uses a combination of the following two CM:

- 1) CM 1 – Evidence demonstrates that:
 - harvesting does not take place in critical habitats* for Specified Risk species identified; OR
 - harvesting activities are consistent with the federally approved Action Plan or Range Plan; OR
 - harvesting is permitted through SARA (section 73 permit).

Evidence is reviewed annually, through review of the supply chain.

- 2) CM 8 – Evidence demonstrates that actions are implemented within the sourcing area to mitigate the threats caused by forest activities to critical habitat* identified in the Federal Recovery Strategy.



Based on each client's confirmed sourcing, research has been summarized as to how forest management actions have mitigated the identified threats. Refer to the DDS Supplement for specifics.

Indicator 3.2 – Intact Forests

For Intact Forest Landscapes (IFL), there are seven potential Mandatory CM (NRA pg. 125-126). The Zimmfor DDS uses a combination of the following two CM:

- 1) CM 1 – Operations do not occur within IFLs.

Evidence is reviewed annually, through review of the supply chain.

- 2) CM 2 – Forest operations do not reduce an IFL below 50,000 ha, AND all meet applicable options below:
 - a) For an IFL between 50,000 and 62,500 ha, cumulative impacts forest operations do not affect more than 10% of the IFL.
 - b) For an IFL between 62,501 and 75,000 ha, cumulative impacts forest operations do not affect more than 20% of the IFL.
 - c) For an IFL between 75,001 and 200,000 ha, cumulative impacts forest operations do not affect more than 30% of the IFL.
 - d) For an IFL between 200,001 and 500,000 ha, cumulative impacts forest operations do not affect more than 35% of the IFL.
 - e) For an IFL larger than 500,001 ha, cumulative impacts forest operations do not affect more than 45% of the IFL.

Based on each client's confirmed sourcing, research has been summarized as to how IFL are outside the timber harvesting land-base, or how operations meet cumulative impact requirements. Refer to the DDS Supplement for specifics.

CW Category 4.1 – Conversion

For Conversion, there are three potential Mandatory CM (NRA pg. 154). The Zimmfor DDS uses a combination of all three CM:

- 1) CM 1 – Evidence demonstrates that supplied material does not originate from areas converted to non-forest.

Evidence is reviewed annually, through review of the supply chain.

- 2) CM 2 – Evidence demonstrates that supplied material originates from acceptable sources of conversion, including:

- Conversion that results in conservation benefits (e.g. ecological restoration, species at risk protection)
- Publicly approved changes in zoning within urban areas

Evidence is reviewed annually, through review of the supply chain.

- 3) CM 3 – The Organization demonstrates support for existing integrated land management processes designed to reduce the cumulative impact of changes to non-forest landscapes.

Based on each client's confirmed sourcing, research has been summarized as to how integrated land management processes address cumulative impacts. Refer to the DDS Supplement for specifics.



Complaints and Contact Information

Complaints related to the DDS (including the DRP) should be forwarded to the Zimmfor FSC Risk Assessment Manager at: FSC.DDS@zimmfor.com.

All complaints and comments received related to the Zimmfor DDS will be managed consistent with the FSC CW Standard (40-005 v3-1, section 7).

Complaints/comments must note the applicable client, province, FSC CW category and any applicable evidence to support the complaint/comment.

Complaints related to the FSC Canada National Risk Assessment should be forwarded to FSC Canada at info@ca.fsc.org, or via the FSC Canada website at <https://ca.fsc.org/en-ca>.



Appendix 1 – Participating Client List and Applicable Source Areas



Participating Clients (Organizations)	Applicable Source Areas - Canada							
	Alberta	British Columbia	Saskatchewan	Ontario	Quebec	New Brunswick	Nova Scotia	Prince Edward Island
Arauco NA				Y		Y		Y
Bakerview Forest Products		Y						
Boise Cascade	Y	Y						
Bright Wood	Y	Y				Y		
Columbia Forest Products	Y	Y		Y	Y	Y	Y	Y
Cosmo Specialty Fibers		Y						
Eldcan Forest Products		Y						
International Veneer		Y						
JELD-WEN USA	Y	Y				Y		
Metrie Mfg	Y	Y		Y	Y			
Murphy Co.		Y			Y			
Harmac-Pacific		Y						
Nippon Dynawave Packaging	Y	Y						
Nippon Paper Lumber (NPL)		Y						
NORPAC	Y	Y						
Northwest Hardwoods	Y	Y	Y					
PLS International		Y						
Patrick Lumber		Y						
Port Townsend Group		Y						
PotlatchDeltic				Y				
Rich-ply		Y						
Sierra Pacific Industries		Y						
Taan Forest		Y						
The Finishing Store		Y						
Tokushu Tokai Paper		Y						
Trans-Pacific Trading		Y						
Western Forest Products		Y						