



**CONTROLLED WOOD
PUBLIC SUMMARY
RISK ASSESSMENTS REPORT**

Reviewed by:

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for:

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General Information

Date of the risk assessment done by the organization:	10/02/2013
Date of the review by the organization:	2/26/2015
Date of the review by QMI-SAI Global:	November 4, 2013
Certification Code:	QMI-COC-001158 QMI-CW-001158
Date of Certificate Issue:	Oct 21, 2010

Risk Assessment Results

Country:	USA and Canada
State/Province	Maine, New Hampshire, Vermont, New Brunswick, Nova Scotia, Prince Edward Island
Names of district:	North Eastern US -Ecoregions: The Northeastern Highlands, North Eastern Coastal Zone, Laurentian Plains and Hills, Hudson Lowlands, Eastern Great Lakes Canada-Ecoregions: New England-Acadian, Eastern Canadian, Gulf of St. Lawrence lowland

1. Illegally Harvested Wood	Risk Conclusion <input checked="" type="checkbox"/> Low <input type="checkbox"/> Unspecified
Brief justification for Low Risk	<p>Rationale: The FSC Risk Registry along with the listed sources can conclude that the districts of interest can be considered low risk for illegal wood harvesting:</p> <ul style="list-style-type: none"> -All of the districts of interest have strong forest governance that regulate and enforce laws. Any violations are prosecuted through legal liability. -Harvesting without legal right is prohibited in each district through national and state governments. Forest regulatory agencies grant harvesting permits and licenses for both public and private lands, private woodlot owners are also encouraged to sign timber contracts. It is a legal requirement that all wood be tracked from the point of origin to the mill. -Transportation of wood must be accompanied by a trip ticket to the mill that identifies its origin -There is no evidence that wide scale illegal logging is a problem in the United States or Canada. The forest governing bodies of each district regulate and enforce laws and fines when the few instances of non systematic small scale illegal harvesting occurs. As stated by the American Hardwood Export Council in their Seneca Creek Study <i>“Based on the data compiled and analyzed, the weight of evidence strongly indicates that there is very low risk that US hardwood exports contain wood from illegal sources”</i> -All exports must contain documentation and Shipping export documentations that are verified at US Customs - Forest management organizations retain signed timber sale agreements for the harvest of public lands as well as encourage private landowners to do the same. State and Provincial governments have strict timber harvesting laws which all require identification by landowner, block numbers, harvest number, contracts, etc to prevent illegal logging -There is a low perception of corruption to the granting of permits and enforcement of laws related to harvesting and wood trade in the USA(CPI of 74 in 2014-ranked 17th) and Canada (CPI of 81 in 2014-ranked 10th) with 100 being very clean. - Using www.CITES.org, http://wwf.panda.org/, and http://www.illegal-logging.info a review of the illegal logging databases were reviewed and found no large scale illegal logging, or logging of endangered species within Woodland Pulp LLC’s supply area. These websites were reviewed to determine if any regional species purchased at Woodland Pulp LLC were listed, which none were. Areas of protected and endangered species are regulated by the appropriate governmental organization. Strict regulations prohibit the harvesting of these species as well as documentation accompanied by each load of wood delivered.

	-Various controlled wood documents in the districts of origin have been reviewed
Sources of Information to Assess Indicators	<p>http://www.globalforestregistry.org/map</p> <p>http://www.maine.gov/doc/mfs/rules_regs/index.htm</p> <p>http://www.nhdfi.org/fire-control-and-law-enforcement/forest-law-enforcement.aspx</p> <p>http://www.vtfpr.org/htm/forestry.cfm</p> <p>http://www2.gnb.ca/content/gnb/en/departments/natural_resources/ForestsCrownLands.html</p> <p>http://novascotia.ca/natr/forestry/laws/</p> <p>http://www.americanhardwood.org/fileadmin/docs/Seneca_Creek_Study/Seneca_Creek_Study_-_Full_Version.pdf</p> <p>http://www.sfmcanada.org/en/forest-products/legal-forest-products#Fed</p> <p>www.cites.org</p> <p>http://www.transparency.org/</p> <p>http://eia-global.org/lacey/P6.EIA.LaceyReport.pdf</p> <p>http://www.illegal-logging.info/</p> <p>http://www.nbwoodlotowners.ca/?section=9&PHPSESSID=18fd9af0ba58888a4f089b1da6ac1996</p> <p>http://info.fsc.org/</p> <p>http://www.cites.org/</p> <p>http://export.gov/wisconsin/exportbasics/eg_us_wi_021114.asp</p> <p>http://www.gov.pe.ca/forestry/foresthitory</p>

2. Wood harvested in violation of traditional or civil rights	Risk Conclusion <input checked="" type="checkbox"/> Low <input type="checkbox"/> Unspecified
Brief justification for Low Risk	<p>Rationale: The FSC Risk Registry along with the listed sources can conclude that the districts of interest can be considered low risk for wood being harvest in violation of traditional or civil rights.</p> <ul style="list-style-type: none"> -The is no UN security council ban on timber exports from the USA or Canada as reviewed by the FSC Risk Registry, AHEC, -There is no conflict timber in these districts according to FSC Risk Registry, USAID, and several other groups -There is no evidence of child labor or violations of the ILO Fundamental Principles and Right at work taking place in the districts of Interest. Very strict laws prohibit the use of child labor as well as prohibit violating any citizen’s rights through the procurement district and North America. -The risk assessment completed by John Gunn for Woodland Pulp LLC confirmed that no third parties, indigenous peoples, property, tenure and use rights were being violated in Woodland Pulp LLC supply area. There are no areas within the supply area that have violated any of these rights. As quoted by John Gunn in the Woodland Pulp LLC 2008 Risk Assessment: <i>“The US and Canada are not listed as areas with a UN Security Council Ban on timber export. Prior certification assessments of landowners throughout Maine have not discovered conflicts related to long term land tenure rights to forest resources involving indigenous people. In the United States, harvests on indigenous lands are conducted under contract with the appropriate tribe. Throughout Canada, First Nation forest land tenure is recognized and harvests are managed by tribes. The First Nations Forest Program is a partnership among First Nations, Indian and Northern Affairs Canada, and Natural Resources Canada that provides resources and funding to support community forest management projects.”</i> -State and provincial laws and regulations along with the due diligence under the category classified “illegal logging” provide assurance that covers the socio-political context for this category. - Violation of ILO convention 169 and the right of Indigenous and Tribal people is not known to be a problem as reviewed and stated by AHEC, and the FSC Risk Registry. -There are equitable processes to resolve conflicts in both the USA and Canada - Various controlled wood documents in the districts of origin have been reviewed

Sources of Information to Assess Indicators

- <http://www.globalforestregistry.org/map>
- http://www.americanhardwood.org/fileadmin/docs/Seneca_Creek_Study/Seneca_Creek_Study_-_Full_Version.pdf
- www.un.org
- <http://www.illegal-logging.info/>
- <http://www.sfmcanada.org/en>
- <http://www.ardinc.com/projects/project.php?area=Regions&tid=270>
- www.usaid.gov
- http://www.cifor.org/publications/Corporate/FactSheet/forests_conflict.htm
- <http://www.ilo.org/ipecinfo/product/viewProduct.do?productId=13313>
- http://www.hrsdc.gc.ca/eng/labour/labour_law/index.shtml
- <http://www.mainelegislature.org/legis/statutes/30/title30ch601sec0.html>
- <http://info.fsc.org/>
- <http://www.afn.ca/index.php/en>
- http://www.hrsdc.gc.ca/eng/labour/labour_law/index.shtml
- <http://www.dol.gov/dol/topic/safety-health/>

3. Wood harvested from forest in which high conservation values are threatened by management activities	Risk Conclusion <input checked="" type="checkbox"/> Low <input type="checkbox"/> Unspecified
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Brief justification for Low Risk	<p>Rationale: The FSC Risk Registry along with the listed sources can conclude that the districts of interest can be considered low risk for wood being harvested from forests in which high conservation values are threatened by management activities.</p> <ul style="list-style-type: none"> -No source areas are considered to be within a Global 200 Ecoregion -No source areas are considered to be a “Biodiversity Hotspot” by Conservation International -No source areas within the United States or Canadian Maritimes (except for Labrador) are considered “large intact forest landscape” or frontier forest by Global Forest Watch -Both the US and Canada have extensive protective areas and laws that is adequate for the protection of HCVFs. - Various controlled wood documents in the districts of origin have been reviewed -Review of State/Federal Laws - There is a high level of forest certification in the districts of interest
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Sources of Information to Assess Indicators	<p>http://www.globalforestregistry.org/map</p> <p>http://www.conservation.org/where/north_america/pages/priorities.aspx</p> <p>www.panda.org</p> <p>http://www.intactforests.org/</p> <p>http://www.cbd.int/</p> <p>http://www.mddep.gouv.qc.ca/biodiversite/aires_protegees/orientation-en/index.htm</p> <p>http://www.cbd.int/information/parties.shtml</p> <p>http://www.americanhardwood.org/fileadmin/docs/Seneca_Creek_Study/Seneca_Creek_Study_-_Full_Version.pdf</p> <p>http://info.fsc.org/</p>
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4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses		Risk Conclusion <input checked="" type="checkbox"/> Low <input type="checkbox"/> Unspecified																				
Brief justification for Low Risk	<p>Rationale: The FSC Risk Registry along with the listed sources can conclude that the districts of interest can be considered low risk for wood being harvested from areas being converted from forests and other wood ecosystems to plantations or non-forest use.</p> <p>-The procurement area is a much regulated area where State and Provincial governments monitor close watch of the forestry rules and regulations, as well as require the use of comprehensive land use and forest management plans. The supply area is not an area where any large scale conversions or plantations are created.</p> <p>- Forest Inventory and Analysis shows that annual tree growth volume in Maine’s ecoregions is much larger than annual harvest volumes. A positive growth and drain ratio in these ecoregions is a very good indication that forest conversions are not occurring at a significant rate.</p> <p>-After reviewing several sources and the below chart Canada and the USA are well below the deforestation rate of -.5%.year.</p>																					
	<table border="1"> <thead> <tr> <th data-bbox="489 841 783 1008">EPA Ecoregion</th> <th data-bbox="783 841 959 1008">Total Forest Area 1992 (sq. km)</th> <th data-bbox="959 841 1142 1008">Total Forest Area 2000 (sq. km)</th> <th data-bbox="1142 841 1394 1008">1992-2000 Development Change</th> <th data-bbox="1394 841 1593 1008">1992-2000 Forest Change</th> <th data-bbox="1593 841 1759 1008">Annual Forest Change</th> </tr> </thead> <tbody> <tr> <td data-bbox="489 1008 783 1110">Northeastern Highlands Ecoregion</td> <td data-bbox="783 1008 959 1110">103,672</td> <td data-bbox="959 1008 1142 1110">103,421</td> <td data-bbox="1142 1008 1394 1110">+0.2%</td> <td data-bbox="1394 1008 1593 1110">-0.2%</td> <td data-bbox="1593 1008 1759 1110">-.025%</td> </tr> <tr> <td data-bbox="489 1110 783 1213">Laurentian Plains and Hills</td> <td data-bbox="783 1110 959 1213">35,008</td> <td data-bbox="959 1110 1142 1213">35,175</td> <td data-bbox="1142 1110 1394 1213">+0.2%</td> <td data-bbox="1394 1110 1593 1213">+0.3</td> <td data-bbox="1593 1110 1759 1213">+0.04</td> </tr> </tbody> </table>					EPA Ecoregion	Total Forest Area 1992 (sq. km)	Total Forest Area 2000 (sq. km)	1992-2000 Development Change	1992-2000 Forest Change	Annual Forest Change	Northeastern Highlands Ecoregion	103,672	103,421	+0.2%	-0.2%	-.025%	Laurentian Plains and Hills	35,008	35,175	+0.2%	+0.3
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http://www.maine.gov/doc/mfs/rules_regs/index.htm

<http://www.nhdfi.org/fire-control-and-law-enforcement/forest-law-enforcement.aspx>

<http://www.vtfpr.org/htm/forestry.cfm>

http://www2.gnb.ca/content/gnb/en/departments/natural_resources/ForestsCrownLands.html

<http://novascotia.ca/natr/forestry/laws/>

http://www.nrs.fs.fed.us/pubs/rn/rn_nrs143.pdf

<http://info.fsc.org/>

<http://www.fao.org/forestry/sofo/en/>

<http://www.fao.org/docrep/013/i2000e/i2000e05.pdf>

5. Wood from forests in which genetically modified trees are planted		Risk Conclusion <input checked="" type="checkbox"/> Low <input type="checkbox"/> Unspecified
Brief justification for Low Risk	<p>Rationale: The FSC Risk Registry along with the listed sources can conclude that the districts of interest can be considered low risk for wood being harvested from areas in which genetically modified trees are planted</p> <ul style="list-style-type: none"> -Genetically Modified Trees are regulated by the Canadian Food and Inspection Agency -Genetically modified trees are not being used on a commercial scale in the USA or Canada -Global Forestry Registry Classifies USA and Canada s Low Risk - Licenses are required for commercial use of GM trees and there are no licenses in the supply area. Also, it is illegal to use GM trees in the country of concern. - Using Woodland Pulp LLC’s Controlled Wood Risk Assessment, Load Slip Documentation, and the listed websites, wood fiber sourced in the districts of interest do not come from genetically modified trees and that it is very “low likelihood.” - Various controlled wood documents in the districts of origin have been reviewed 	
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