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Purpose:

To provide guidance and direction to all Woodland Pulp LLC Wood Procurement Group employees and mill managers (Woodland Pulp LLC), independent wood suppliers and contractors in order that they may effectively contribute to the achievement of the principles and objectives of the Sustainable Forestry Initiative® (SFI) Program 2022 Standard Objectives 1-11 (SFIS).

In developing the following policies, Woodland Pulp LLC Environmental and Forest Policy have been incorporated within the context of wood procurement operations. All employees are required to read Woodland Pulp LLC policies and use them as a guide in the conduct of their activities. All wood procurement activities will be conducted in compliance with applicable Federal, State, Provincial, County, Town and Municipal government regulations.

Policies:

SFIS Objective # 1: Biodiversity in Fiber Sourcing

- 1 Policy: Woodland Pulp LLC shall address and promote the conservation of biodiversity.**

In order to implement this policy, Woodland Pulp LLC will:

- 1.1 Provide information to suppliers to promote biological diversity utilizing information from organizations such as NatureServe, State and Provincial Governments, The National Wildlife Federation, etc.
- 1.2 Support conservation of biodiversity and trainings through annual SFI Implementation Committee dues and participation in Maine and New Brunswick.

SFIS Objective # 2: Adherence to Best management Practices

- 1. Policy: Woodland Pulp LLC shall promote the use of professional wood producers and adhere to policies for adverse weather conditions. (See Wood Procurement Policy)**

In order to implement this policy, Woodland Pulp LLC will:

- 1.1 If stumpage is purchased, require the use of Best Management Practices.
- 1.2 Prefer wood from suppliers who complete and maintain SIC BMP Training Requirements for SFI®. We will purchase from Master Loggers when feasible.
- 1.3 Our Purchase at Plant Agreements will require the use of Best Management Practices.
- 1.4 We will manage inventories in a way that addresses adverse weather conditions.
- 1.5 Our fiber sourcing policies will be made available to suppliers.

- 2. Policy: Woodland Pulp LLC will monitor the effectiveness and the use of BMP's**

In order to implement this policy, Woodland Pulp LLC will:



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- 1.6 Utilize Maine Forest Service reporting in Maine and Marketing Board reporting in New Brunswick.
- 1.7 Use successive reports to determine gaps and set goals for improvement in BMP compliance.
- 1.8 Procurement foresters will monitor BMP compliance on their supplier operations on the average of one visit per month while active.

SFIS Objective # 3 Use of Qualified Resource and Qualified Logging Professionals and Certified Logging Companies

- 1. Policy: Woodland Pulp LLC shall promote the use of qualified resource professionals and qualified logging professionals in achieving sustainable forestry.**

In order to implement this policy, Woodland Pulp LLC will:

- 1.1 Provide notice of training opportunities to our suppliers.
- 1.2 Facilitate access to forestry and logging professionals during contacts with landowners.

- 2.1 Maintain a list or link access to Master Logger Companies in Maine.

SFIS Objective # 4 Legal and Regulatory Compliance

- 1. Policy: Woodland Pulp LLC will take appropriate steps to comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations**

In order to implement this policy, Woodland Pulp LLC will:

- 1.1 Maintain access to sources describing laws and regulations and interact with the government affairs office on relevant proposed changes.
- 1.2 Maintain a file of Purchase at Plant Agreements for each wood supplier which contains their signature agreeing to abide by all relevant laws and regulations.
- 1.3 Cooperate with regulatory agencies on issues related to wood supply.
- 1.4 Annually review Woodland Pulp's controlled wood risk assessment to address the likelihood of sourcing from uncontrolled/controversial sources.
- 1.5 Maintain PAPA and Supplier Declaration records for active suppliers.
- 1.6 Woodland Pulp will follow the company's Controlled Wood Procedures and will not accept any fiber that is considered to be from an uncontrolled source.


- 2. Policy: Woodland Pulp LLC Policy**

- 2.1 Woodland Pulp LLC Intranet
- 2.2 Forestry enterprises will respect the rights of workers.

SFIS Objective # 5 Objective Forestry Research, Science and Technology

- 1. Policy: Woodland Pulp LLC shall support forestry research, science and technology upon which sustainable forest management decisions are based.**

In order to implement this policy, Woodland Pulp LLC will:

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- 1.1 Support research at the School of Forest Resources – UMaine.
- 1.2 Cooperate with state and provincial research efforts to protect and improve water quality.
- 2.1 Obtain regeneration and growth-and-drain assessments at least once every 5 years where available.
- 2.2 Obtain BMP implementation and compliance information in Maine or New Brunswick at least every 2 years.
- 2.3 Make use of the latest information for the conservation of biodiversity at least once every 5 years.
- 3.1 Monitor climate models where available, showing impacts on forest health, productivity and viability.
- 3.2 Learn climate change impacts on wildlife, wildlife habitats, and conservation of wildlife diversity.

SFIS Objective # 6 Training and Education

1. **Policy: Woodland Pulp LLC will improve the implementation of sustainable forestry practices through training and education programs.**

In order to implement this policy, Woodland Pulp LLC will:

- 1.1 Make sure that the procurement staff is familiar with Policy and by SFI annual training for wood procurement staff and SFI awareness training annually for mill managers and scalers regarding our implementation of the SFI standards.
- 1.2 Make SFI assignments clear through the Performance Management Process.
- 1.3 Provide training opportunities for staff sufficient to carry out responsibilities.
- 1.4 Require that contractors have training sufficient to carry out their responsibilities and maintain a signed PAPA.
- 1.5 Source wood from Master Loggers where available and other logging professionals when feasible. <http://www.masterloggercertification.com/>, <http://www.clploggers.com/>
- 2.1 Support the development and delivery of training for wood producers that encompasses all eleven of the criteria described in the standard. We will forward promotional material to suppliers whenever it becomes available.
- 2.2 Support the SFI implementation committee's efforts to recognize logger certification programs that include the 8 criteria described in the standard and the continuing education component as described in the SFI standard.

SFIS Objective # 7: Community Involvement and Landowner Outreach

1. **Policy: Woodland Pulp LLC will broaden the practice of sustainable forestry through public outreach, education, involvement and to support the efforts of SFI Implementation Committees.**

In order to implement this policy, Woodland Pulp LLC will:



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- 1.1 Support SFI implementation committees in Maine and New Brunswick through annual dues and committee participation.
- 1.2 Support the development and distribution of sustainable forestry information to landowners through participation in SFI SIC through interaction with the Maine Forest Service, attend implementation committee meetings, and through the marketing boards in New Brunswick.
- 1.3 Information shall provide guidance on BMPs, reforestation, visual quality management, and the conservation of critical habitat including Forests with Exceptional Conservation Value, management of harvest residue, control of invasive exotic plants and animals, and characteristics of special sites.
- 1.4 Be involved with implementation committees, SFI SIC and the Washington County SWCD to support and promote conservation of managed forests.
- 1.5 Give in-kind support to the distribution of state and/or provincial materials that address the conservation of biological diversity.
- 1.6 Circulate information on regional conservation planning to wood procurement staff.
- 1.7 Encourage landowners to participate in forest management certification programs.

- 2.1 Continue in-kind educational efforts and participation efforts through Maine and New Brunswick Implementation Committees, Washington County SWCD and Marketing Boards to provide public outreach and educational opportunities.

- 3.1 Support the Maine SIC when calls regarding nonconforming practices in our procurement area require our resolution.
- 3.2 Provide follow-up for any complaint in Washington County that comes through the toll free call process. (note: Calls in New Brunswick are handled by licensees)
- 3.3 Respond to calls from the public regarding our activities

SFIS Objective # 8 does not apply to procurement activities at Woodland.

SFIS Objective # 9 Communications and Public Reporting

1. Policy: Woodland Pulp LLC will document progress and opportunities for improvement.


In order to implement this policy, Woodland Pulp LLC will:

- 1.1 Provide SFI Inc. with the summary audit reports as detailed in the standard.
- 2.1 Produce and forward Woodland's SFI annual progress report before it is due.
- 2.2 Secure confirmation of training status for all roundwood suppliers so that volumes from trained and untrained sources can be clearly summarized. Records will be maintained so that his calculation can be reproduced for audit purposes.
- 2.3 Maintain copies of past reports for the purpose of demonstrating conformance and improvements.

SFI Objective # 10 Management Review and Continual Improvement

1. Policy: Woodland Pulp LLC will hold management reviews annually to examine findings and progress in order to make improvements and inform employees.

In order to implement this policy, Woodland Pulp LLC will:

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- 1.1 Produce a review of conformance to each section of the SFI Standards provided by the SFI internal audit. The procurement foresters will determine the effectiveness of programs and procedures and suggest any changes to be reviewed by management.
- 1.2 Review progress in achieving the SFI Standard objective and will be discussed between management and the wood procurement staff during monthly meetings. A yearly meeting dedicated to a review of this progress will precede setting of goals.
- 1.3 At this annual SFI review management will decide on recommendations provided by the SFI coordinator and the procurement foresters in order to assure continual improvement of SFI conformance.

SFI Objective #11 – Avoid Controversial Sources

2. Policy: Woodland Pulp LLC shall manage the risk of sourcing from Controversial Sources

Controversial sources are defined as:

- a. **Forest activities which are not in compliance with applicable state, provincial, federal, or international laws.**
- b. **Forest activities which are contributing to regional declines in habitat conservation and species protection (including biodiversity and special sites, Alliance for Zero Extinction sites and key biodiversity areas, threatened and endangered species).**
- c. **Conversion sources originating from regions experiencing forest area decline.**
- d. **Forest activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at work (1998) are not met.**
- e. **Forest activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) are not met.**
- f. **Fiber sourced from areas without effective social laws.**
- g. **Illegal Logging including trade in CITES (The Convention on international Trade in Endangered Species of Wild Fauna and Flora) listed species.**
- h. **Conflict Timber.**
- i. **Genetically modified trees via forest tree biotechnology.**

- 1.1 Woodland Pulp LLC shall implement a due diligence system (DDS) to access and collect information regarding the sources of its procured fiber to address the likelihood of sourcing from controversial sources
- 1.2 DDS shall include identification of tree species potentially included in products, Country and region of harvest of fiber.
- 1.3 Information shall be provided to customers upon request.
- 1.4 Woodland Pulp LLC shall implement a program to asses substantiated concerns, supported by proof or evidence indicating that fiber originates from controversial sources.
- 1.5 Woodland Pulp LLC shall ensure to mitigate risk of sourcing controversial fiber from high-risk areas.
- 1.6 Where the verifiable measures are not considered to be effective in reducing the risk of receiving fiber from controversial sources to low, fiber from these sources shall be avoided.