



Canada



**Sustainable Biomass Program (SBP)**

# **Regional Risk Assessment for Alberta Forest Canada**

**SBP-RRA-CA-AB-FOR v1.0**

**Interim RRA**

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## Version v1.0

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In the case of inconsistency between translations, the official English language version shall always take precedence.

SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact: [info@sbp-cert.org](mailto:info@sbp-cert.org)

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## Abbreviations

|                |   |
|----------------|---|
| <b>AAC</b>     | Annual Allowable Cut  |
| <b>AAFMP</b>   | Association of Alberta Forest Management Professionals                          |
| <b>ABMI</b>    | Alberta Biodiversity Monitoring Institute                                       |
| <b>ACIMS</b>   | Alberta Conservation Information Management System                              |
| <b>AELCS</b>   | Alberta Environment Ecological Classification System                            |
| <b>AFMPS</b>   | Alberta Forest Management Planning Standard                                     |
| <b>AFPA</b>    | Alberta Forest Products Association   |
| <b>ALSA</b>    | Alberta Land Stewardship Act  |
| <b>AOP</b>     | Annual Operating Plan   |
| <b>BMP</b>     | Best Management Practices   |
| <b>CFS</b>     | Canadian Forest Service   |
| <b>CITES</b>   | Convention on International Trade in Endangered Species of Wild Fauna and Flora |
| <b>CoC</b>     | Chain of custody  |
| <b>COSEWIC</b> | Committee of the Status of Endangered Wildlife in Canada                        |
| <b>COR</b>     | Certificate of Recognition  |
| <b>CSA</b>     | Canadian Standards Association  |
| <b>CWS</b>     | Canadian Wildlife Service   |
| <b>DFO</b>     | Fisheries and Oceans Canada   |
| <b>ECCC</b>    | Environment and Climate Change Canada   |
| <b>EPEA</b>    | Environmental Protection and Enhancement Act                                    |
| <b>ESCC</b>    | Endangered Species Conservation Committee                                       |
| <b>ESDC</b>    | Employment and Social Development Canada  |
| <b>EU</b>      | European Union  |
| <b>EUTR</b>    | European Union Timber Regulation  |
| <b>FMA</b>     | Forest Management Agreement   |
| <b>FMP</b>     | Forest Management Plan  |
| <b>FMU</b>     | Forest Management Unit  |
| <b>FOMP</b>    | Forest Operations Monitoring Program  |
| <b>FPIC</b>    | Free, prior and informed consent  |
| <b>FPPA</b>    | Forest and Prairie Protection Act   |
| <b>FSC</b>     | Forest Stewardship Council  |
| <b>GDP</b>     | gross domestic product  |
| <b>GFW</b>     | Global Forest Watch   |
| <b>GHG</b>     | Greenhouse gas  |
| <b>GMO</b>     | Genetically modified organism   |
| <b>HCV</b>     | high conservation value   |
| <b>ILO</b>     | International Labour Organization   |
| <b>IPCC</b>    | Intergovernmental Panel on Climate Change                                       |
| <b>ITUC</b>    | International Trade Union Confederation   |
| <b>IUCN</b>    | International Union for Conservation of Nature                                  |

|                    |  |
|--------------------|--|
| <b>KPI</b>         | key performance indicator  |
| <b>LULUCF</b>      | Land Use, Land Use Change, and Forestry  |
| <b>MEPA</b>        | Ministry of Environment and Protected Areas  |
| <b>MFP</b>         | Ministry of Forestry and Parks   |
| <b>MJET</b>        | Ministry of Jobs, Economy and Trade  |
| <b>MPB</b>         | mountain pine beetle   |
| <b>NDC</b>         | Nationally Determined Contribution   |
| <b>NRCAN</b>       | Natural Resources Canada   |
| <b>OGR</b>         | Alberta Timber Harvest Planning and Operating Ground Rules                                     |
| <b>OHS</b>         | occupational health and safety   |
| <b>PEFC</b>        | Programme for the Endorsement of Forest Certification  |
| <b>RCMP</b>        | Royal Canadian Mounted Police  |
| <b>REDII</b>       | Renewable Energy Directive 2018/2001   |
| <b>RFMPA</b>       | Regulated Forest Management Profession Act   |
| <b>RPF</b>         | Registered Professional Forester   |
| <b>RPFT</b>        | Registered Professional Forest Technologist  |
| <b>RRA</b>         | Regional Risk Assessment   |
| <b>RRA-AB</b>      | Regional Risk Assessment, Alberta  |
| <b>RTE</b>         | rare, threatened or endangered   |
| <b>SAR</b>         | Species at risk  |
| <b>SARA</b>        | Federal Species at Risk Act  |
| <b>SBP</b>         | Sustainable Biomass Program  |
| <b>SECOR</b>       | Small Employers Certificate of Recognition   |
| <b>SFI</b>         | Sustainable Forestry Initiative  |
| <b>UN</b>          | United Nations   |
| <b>UNDRIP</b>      | United Nations Declaration on the Rights of Indigenous Peoples                                 |
| <b>UNDRIP Act</b>  | United Nations Declaration on the Rights of Indigenous Peoples Act                             |
| <b>UNFCCC</b>      | United Nations Framework Convention on Climate Change  |
| <b>UNICEF</b>      | United Nations Children's Fund   |
| <b>VOITs</b>       | values, objectives, indicators and targets   |
| <b>WAPPRIITA</b>   | Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act |
| <b>WCB Alberta</b> | Workers' Compensation Board of Alberta   |
| <b>WHMIS</b>       | Workplace Hazardous Materials Information System   |
| <b>WPAC</b>        | Wood Pellet Association of Canada  |
| <b>WWF</b>         | World Wildlife Fund  |

## Foreword

The Sustainable Biomass Program (SBP) interim or endorsed Regional Risk Assessments (RRAs) are a key component of SBP's focus on identifying and mitigating risks associated with sustainably and legally sourcing feedstock for biomass pellet and wood chip production. The SBP Framework is designed to provide assurance that feedstock is sourced legally and sustainably. The purpose of an SBP interim or endorsed RRA is to evaluate an entire geographic region and determine the risks associated with sourcing feedstock for biomass pellet or wood chip production from that region. The SBP Regional Risk Assessment (RRA) Procedure Version 2.0 specifies the requirements and processes that must be followed to develop and endorse SBP risk assessments of regions or countries. The SBP RRA procedure requires active engagement with a diverse range of stakeholders in the region. The RRA-AB scope is the harvestable forest land base of Alberta. The Wood Pellet Association of Canada (WPAC) initiated the RRA for Alberta (AB) in 2022 to verify the legality and sustainability of feedstock. In 2023, the SBP engaged Hopkin Forest Management Consulting Ltd. and a team of independent natural resource and certification professionals to form the Working Body and complete the RRA. The Working Body facilitated the risk assessment to ensure relevant Alberta laws, policies and practices, as well as practical knowledge of forestry in Alberta, were accurately captured in the RRA. Information was compiled from the experience and knowledge of consultants, interviews with experts, applicable legislation, reports from provincial authorities and other stakeholders, various databases, and statistical data sources. Information was obtained from provincial authorities, such as the Alberta Ministry of Forestry and Parks (MFP) and Ministry of Environment and Protected Areas (MEPA), and federal authorities, such as the Canadian Forest Service (CFS) of Natural Resources Canada (NRCAN), and Environment and Climate Change Canada (ECCC). Many stakeholders were consulted, and information was obtained verbally and from written public and private sources.

Hopkin Forest Management Consulting, acted as the Working Body responsible for drafting the earlier version of the Draft Regional Risk Assessment (RRA) that was released for public consultation in November 2024. The responsibility for the further iterations of the Draft RRA was then transitioned to SBP. As such, Hopkin Forest Management Consulting was not responsible for responding to stakeholders' comments, completing or finalising the RRA.

# 1 Introduction

A Regional Risk Assessment (RRA) is a way to identify and confirm the risks associated with sourcing feedstock. The scope of this RRA is fibre sourced from harvestable forested land bases in Alberta (AB). The RRA-AB was completed in accordance with the following:

- SBP Standard 1: Feedstock Compliance, v2.0, May 2023
- SBP Standard 2: Feedstock Verification, v2.0, May 2023
- SBP Regional Risk Assessment Procedure, v1.2, May 2021
- SBP Regional Risk Assessment Procedure, v2.0, February 2025
- Guidance for SBP Standard 1, v1.0, May 2023
- Guidance for SBP Standard 2, v1.0, May 2023
- Glossary of Terms and Definitions, SBP, v2.0, May 2023

Sustainable Biomass Program (SBP) Standard 1 states the globally applicable legality and sustainability Indicators that must be evaluated. The 42 Indicators cover a range of ecological, social, and economic requirements that must be evaluated within the Supply Base Area. The Supply Base Area for this RRA is the province of Alberta. The SBP RRA Procedures outline the requirements to complete an RRA.

Section 2 of this report provides the Statement of Scope.

The Methodology for the RRA-AB as implemented by the Alberta Working Body is described in Section 3. SBP Standard 2 describes the requirements. The Working Body has developed a rigorous and objective process to simplify the evaluation process and the comprehension of the conclusions for each of the 42 Indicators.

Prior to reviewing the Indicators, the Working Body requests the reader review the Methodology (Section 3) to understand the logic for information collection, evaluation, and the rationale for the final risk designation (Table 7: Proposed Risk Designation Summary).

As required by SBP RRA Procedures, the draft RRA-AB is to be made available for Stakeholder Consultation. The SBP approach to Stakeholder Consultation is discussed in Section 3.2. In addition, Annex 5: Stakeholder Consultation Report, as required by the RRA Procedures is provided. The Stakeholder Consultation Report provides the stakeholder comments, as well as the SBP's response, including the applicable changes to the Indicator finding and/or the risk designation.

Section 4 of this report provides the Regional Background for the Supply Base Area for RRA-AB. This section helps set the context of the bio-physical, social, and economic values in the province of Alberta. The requirement documents listed above require each Indicator to be evaluated as a single Indicator. Often some of these Indicators are interrelated and/or complex. The Working Body has provided details for this section to (1) provide clarity of interconnection and (2) reduce the repetition of evidence. This section is provided to assist with evaluating the individual 42 Indicators (Annex 1: Detailed Findings for Indicators). Section 4.8 of this report provides the Overview of the Biomass Sector.

Annex 1: Detailed Findings for Indicators provides the conclusion to the risk assessment process for the RRA-AB.

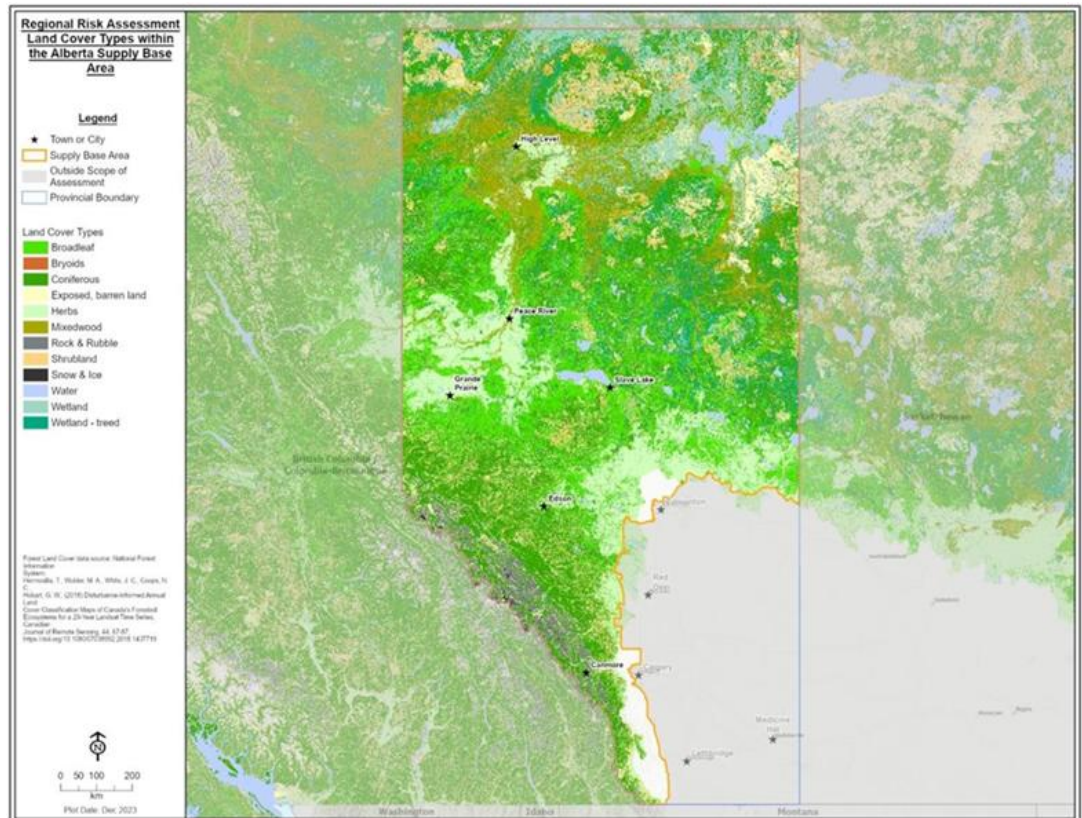
Once the RRA-AB is endorsed by SBP, each Biomass Producer must use the results of the RRA-AB to complete a Supply Base Evaluation. The Supply Base Evaluation is to demonstrate the Biomass Producer's compliance with its findings and implement mitigation measures to manage any specified risks such that the risks can be reduced to low. It is the role of an independent, accredited third-party Certification Body, to verify that the Supply Base Evaluation has been correctly undertaken and that any mitigation measures are being effectively implemented.

## 2 Regional background and statement of scope

### 2.1 Regional background

Alberta is Canada's sixth-largest province, covering an area of 661,848 km<sup>2</sup>, between British Columbia on the west and Saskatchewan on the east. The east slope foothills and eastern ranges of the Rocky Mountains lie within Alberta, including Jasper and Banff National Parks. Most of the forests are in the northern part of the province and a wide strip along the eastern slopes of the Rocky Mountains and sit in the Boreal Forest, Rocky Mountains, Canadian Shield and Foothill ecoregions. The two remaining ecoregions, Grassland and Parkland are in the southern and eastern parts of the province and are predominantly agricultural and are excluded from the Supply Base Area of the Regional Risk Assessment in Alberta. Figure 3 shows the distribution of land cover types across Alberta.

Figure 3: Land Cover Types



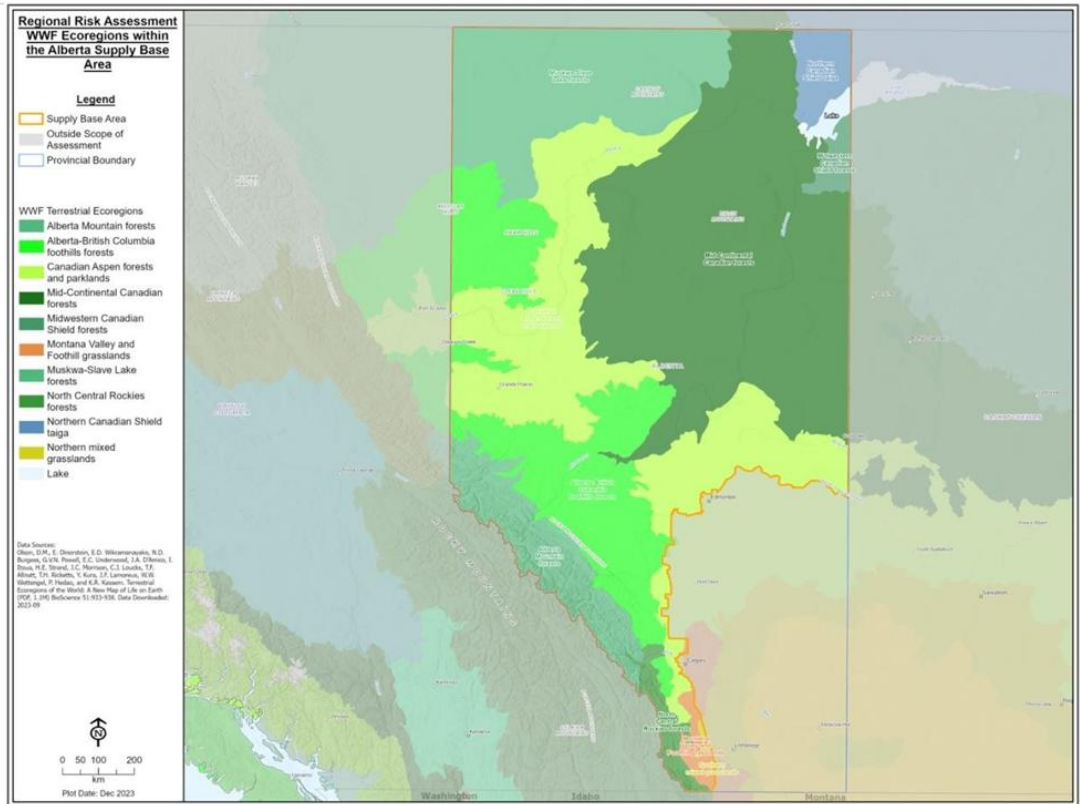
#### 2.1.1 Ecological Overview

##### Ecological Classification

##### Global-Level Ecological Classification

Alberta forests overlap nine of the 11 terrestrial ecoregions identified by the World Wildlife Fund (WWF). The locations and names of these ecoregions within Alberta are shown in Figure 4.

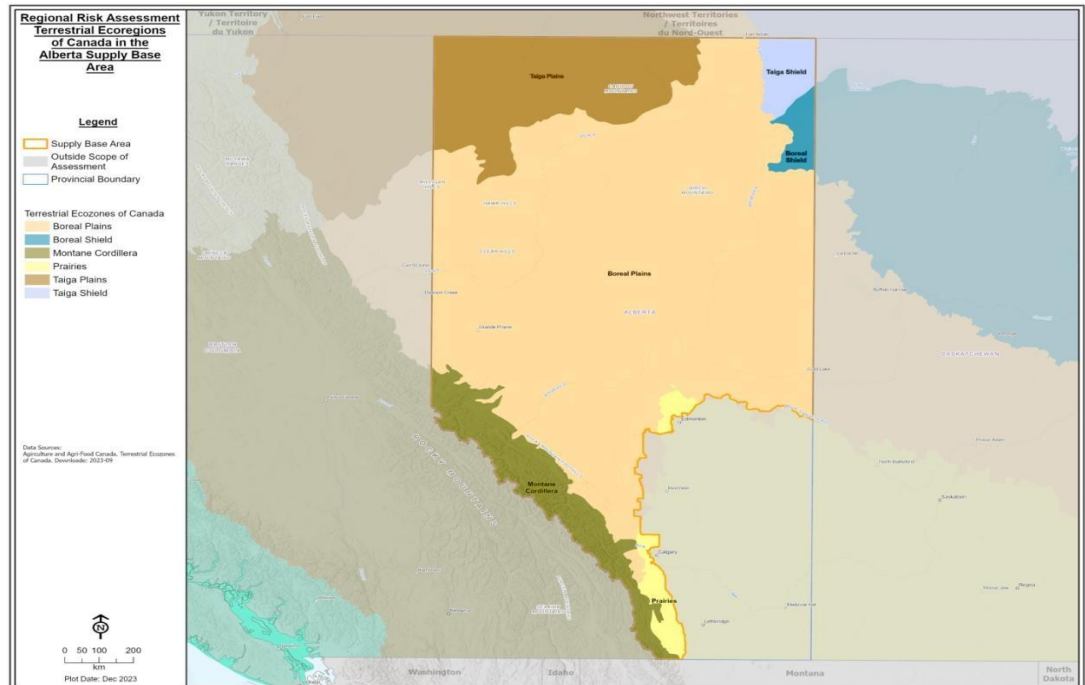
Figure 4: WWF Forest Ecoregions of Alberta



National-Level Ecological Classification

Terrestrial ecozones developed by Environment and Climate Change Canada (ECCC) place Alberta in the six ecozones; (Figure 5).

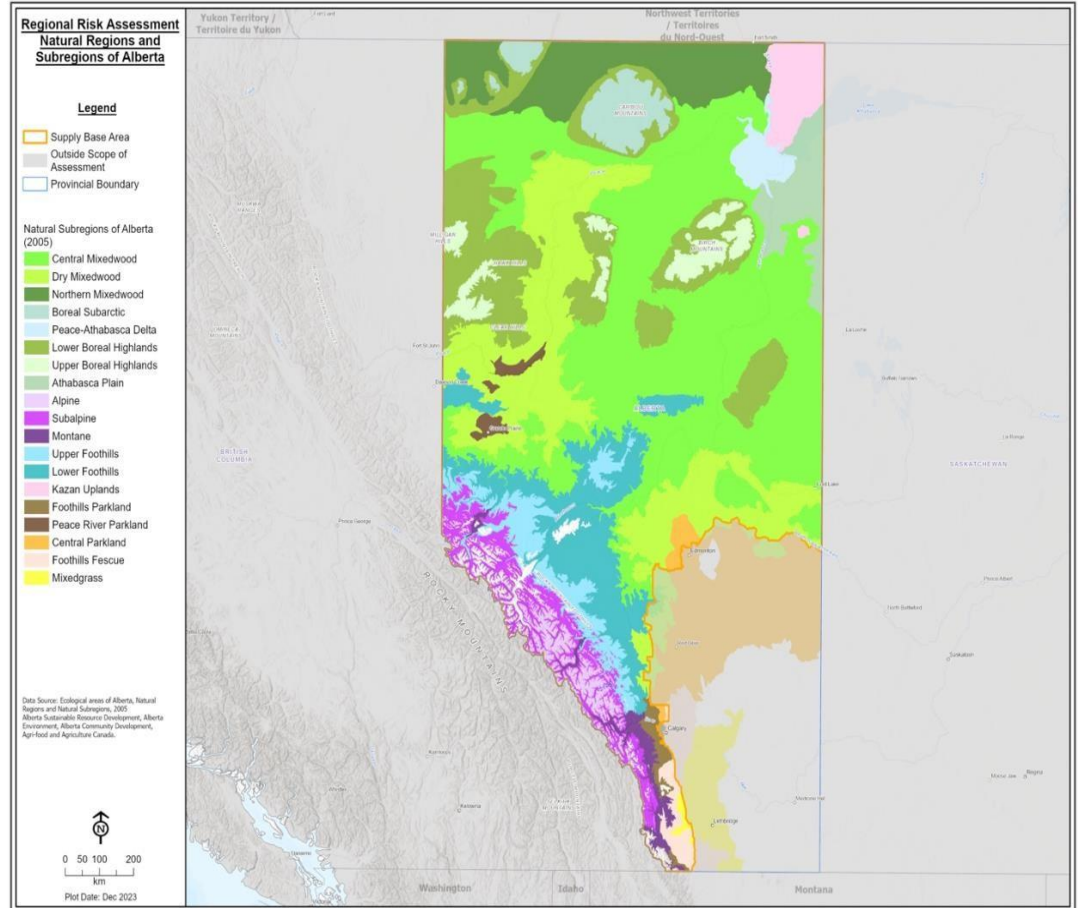
Figure 5: Environment and Climate Change Canada Terrestrial Ecozones



### Provincial-Level Ecological Classification

Alberta's Natural Regions Subcommittee (2006) identified six ecoregions with 21 ecological subregions (Figure 6) based on climate, soils, and topography. There are 28 native tree species in Alberta. The distribution of forest tree species is a function of the climate and soils of the ecoregions. The Rocky Mountain natural region consists of the Alpine, Subalpine and Montane subregions. Elevation and aspect play critical roles in affecting vegetation, with more abundant and more continuous tree cover at lower elevations. Within the treed zones, conifers favour higher elevations and northern exposures, whereas the drier southern and western exposures in the Montane are a mixture of grasslands and deciduous/coniferous forests. The Foothills natural region occurs along the lower slopes of the Rocky Mountains. The climate is generally cool and moist; however, microclimates are greatly influenced by topography and aspect, which also affects the moisture regime. There are two subregions, defined by elevation, in this natural region—the Upper and the Lower Foothills subregions. Lodgepole pine (*Pinus contorta*) forests are typical of the higher elevations and mixed pine (*Pinus*), spruce (*Picea*), and aspen (*Populus tremuloides*), forests predominate in the lower elevations. The largest forested natural region is the Boreal Forest natural region, which extends over 58% of the province. The majority of Alberta north of Calgary lies within this region, and there is also a thin strip running parallel to the western provincial boundary at elevations up to 1,200 m. There are eight natural subregions in the Boreal Forest natural region, ranging from the Dry Mixedwood subregion in the south to the Boreal Subarctic subregion. Tree cover varies throughout. In the south, aspen dominates, with white spruce (*Picea glauca*) as a secondary species. In the large central part of the natural region, aspen, balsam poplar (*Populus balsamifera*), and white spruce forest dominate the uplands, with jack pine (*Pinus banksiana*) and/or lodgepole pine present on drier sites. Moving north, the pines, black spruce (*Picea mariana*) and aspens are the primary forest components on uplands and slopes, with black spruce common on bogs. Throughout this natural region, the topography is flat to gently undulating, and wetlands (bogs, fens and meadows) occupy a large proportion of the landscape.

Figure 6: Alberta Ecological Classification System

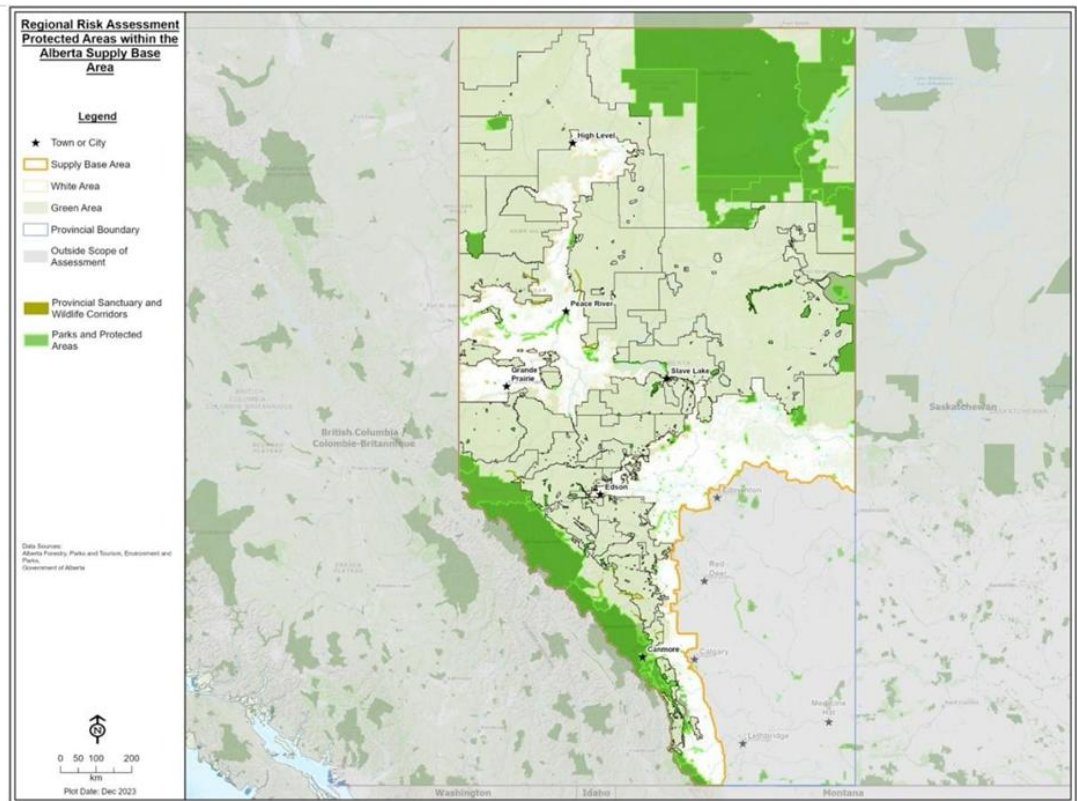


### 2.1.2. Protected Areas and Parks

As of December 2023, 9.9 million ha of the Supply Base Area in Alberta is protected in parks and other types of protected areas (Figure 7).<sup>2</sup> This area includes provincial parks, national parks, and other protection such as wilderness areas, ecological reserves, wildland parks, natural areas, heritage rangelands, and provincial recreation areas.

<sup>2</sup> [Parks and Protected Areas of Alberta](https://open.alberta.ca), open.alberta.ca, Government of Alberta.

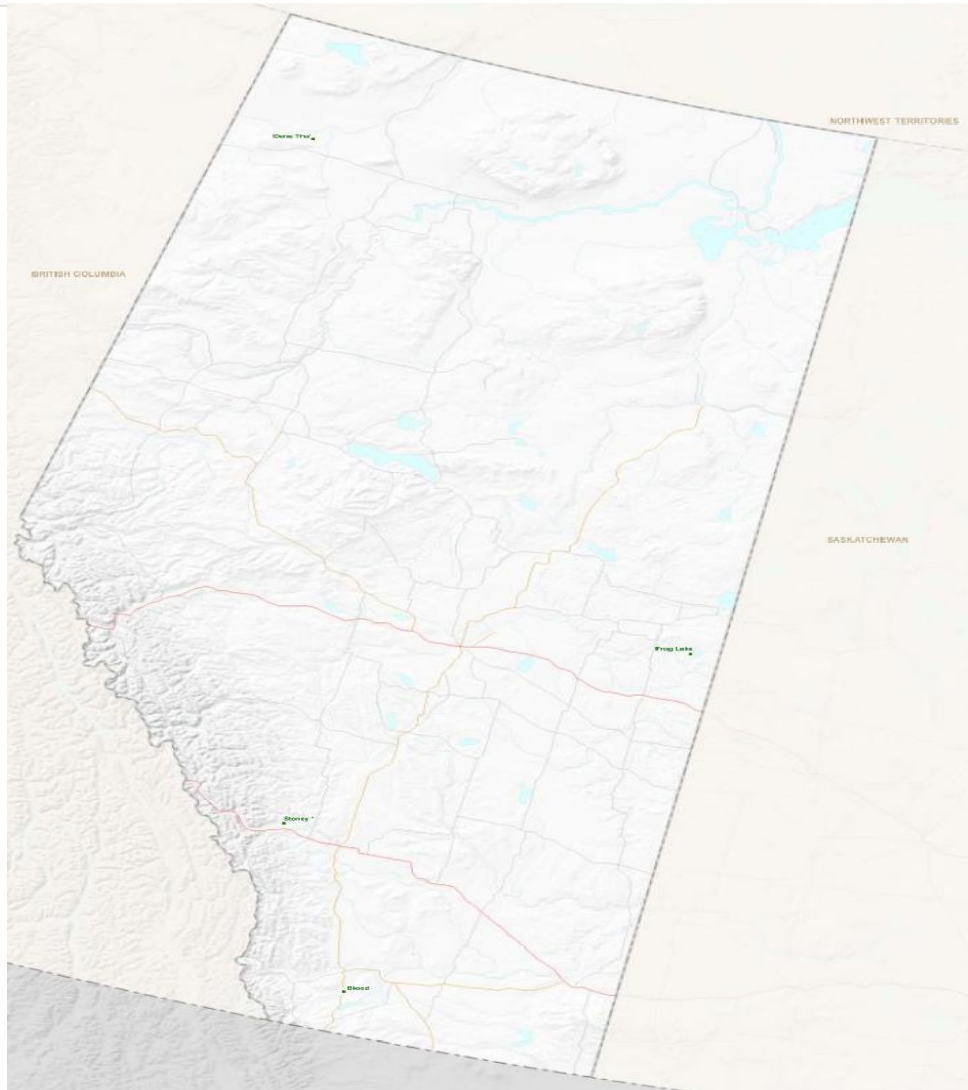
Figure 7: Protected Areas



The Alberta Ministry of Forestry and Parks (MFP), and the Ministry of Environment and Protected Areas (MEPA) are responsible for the effective protection, management and conservation of Alberta’s water, land, air, and living resources. MFP and MEPA oversee the province’s protected areas network, as authorised under three pieces of legislation: Provincial Parks Act, Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangeland Act, and Willmore Wilderness Park Act. Together, the Acts protect area designations and afford legal protection to many of Alberta’s significant natural, ecological, recreational, and cultural features. The term ‘protected area’ can indicate varying levels of protection, from complete restriction of human access to identifying allowable resource use activities that are compatible with conservation and recreation objectives.

### 2.1.3. Indigenous Peoples

In the most current 2021 census, Statistics Canada reported 284,470 Indigenous People in Alberta, representing 6.7% of the population. Of these, 145,640 (51.2%) identified as First Nation, 127,470 (44.8%) identified as Métis, 2,950 (1.0%) identified as Inuit and 8,400 (3.0%) identified under multiple Indigenous ethnicities or include responses not included elsewhere.<sup>4</sup> Before Alberta formally became a province of Canada in 1905, the land was under federal government jurisdiction. By 1905, the Canadian government had negotiated a series of treaties with the First Nations in what became Alberta—some treaties are wholly contained within Alberta’s boundaries, and others extend into adjacent provinces and territories. Treaty 6, an agreement between the Crown (Canada) and the Plains and Woods Cree, Assiniboine, signed in 1876, is centred on present-day Edmonton.<sup>5</sup> Treaty 7, signed in 1877 by five First Nations—the Siksika, Kainai, Piikani, Stoney Nakoda, and Tsuut’ina First Nations—covers the southern plains of Alberta.<sup>6</sup>



Treaty 8 was signed by the Crown and First Nations of the Lesser Slave Lake area in 1899. The largest treaty by area in Canada, it covers 841,487 km<sup>2</sup>, spanning northern Alberta, northwest Saskatchewan, and portions of the Northwest Territories and British Columbia.<sup>7</sup>

<sup>3</sup> [Indigenous Peoples in Alberta](https://www.sac.isc.gc.ca), sac.isc.gc.ca, Government of Canada, Indigenous Services Canada, 2021.

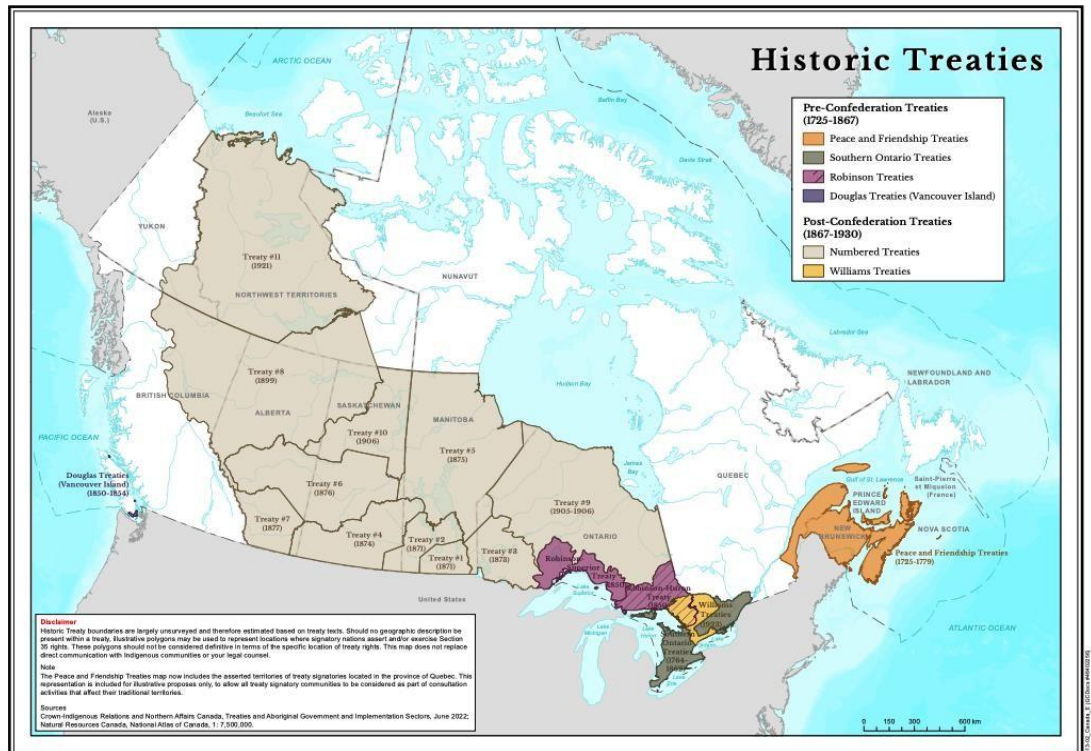
<sup>4</sup> [Indigenous Population Profile, 2021 Census of Population](https://www150.statcan.gc.ca/n1/pub/92-627-x/2021001/article/00001-eng.htm), statscan.gc.ca, Statistics Canada.

<sup>5</sup> [Treaty 6](https://www.thecanadianencyclopedia.ca/en/article/treaty-6), thecanadianencyclopedia.ca, The Canadian Encyclopedia, 2016.

<sup>6</sup> [Treaty 7](https://www.thecanadianencyclopedia.ca/en/article/treaty-7), thecanadianencyclopedia.ca, The Canadian Encyclopedia, 2023.

<sup>7</sup> [Treaty 8 Agreement](https://www.treaty8.bc.ca), treaty8.bc.ca, Treaty 8 Tribal Association.

Figure 9: Territories Covered by Historic Treaties



Indigenous Services Canada, Geomatics Services, June 2022.

Canada

In 1982, the Canadian government passed a revised Constitution Act, in which section 35 recognised and affirmed the Aboriginal and treaty rights of Indigenous Peoples. In 2023, the Métis Nation within Alberta Government Recognition and Self-Government Implementation Agreement was signed by the Métis Nation of Alberta and Canada, in which “Canada officially recognizes that the Métis Nation of Alberta is the Indigenous government representing its citizens and communities within Alberta, known as the Métis Nation within Alberta, and that this Métis collectivity has an inherent right to self-government recognized and affirmed by section 35 of the Constitution Act, 1982.”<sup>8</sup> The Agreement built on the Métis Government Recognition and Self-Government Agreement (2019) and the Framework Agreement for Advancing Reconciliation (2017). The Alberta government has legislation including the Métis Population Betterment Act of 1938, which established 12 Métis Settlements, eight of which still exist and the Métis Settlements Accord Implementation Act which established transitional arrangements for the establishment and development of Settlement area local government structures and system and financial incentives.

<sup>8</sup> [Canada and Métis Nation of Alberta sign updated Métis self-government agreement](https://www.canada.ca/en/crown-indigenous-relations-northern-affairs/news/2023/06/canada-and-metis-nation-of-alberta-sign-updated-metis-self-government-agreement.html), canada.ca, Crown-Indigenous Relations and Northern Affairs Canada and Métis Nation of Alberta, 2023.

In 2023, the Otipemisiwak Métis Government Constitution was developed and approved by Métis citizens. The formation of Métis government departments and other governing bodies is continuing.

#### Relevant Court Rulings

In 2020, the Alberta Court of Appeal ruled in favour of Fort Mackay First Nation who went to court to block a proposed oil sands project near Moose Lake, an area the First Nation has protected for cultural reasons. The Appeal Court determined that the Alberta Energy Commission had a duty to uphold the honour of the Crown and the Commission erred when ruling the proposed project was in the public

interest when the decision breached constitutionally protected Indigenous rights. In the 2021 Blueberry River First Nation vs British Columbia, the court ruled that the cumulative impacts of development were such that Blueberry River First Nation could not meaningfully exercise its treaty rights within its territory. The ruling stated British Columbia was not managing cumulative effects and did not have the capacity or the regulatory incentives to do so. Blueberry River First Nation and the British Columbia government have agreed on development management. Because Treaty 8 extends into northwestern Alberta, the Blueberry River First Nation decision has the potential to affect how Alberta administers and manages its resources. In July 2022, Duncan's First Nation, a Treaty 8 nation based in northern Alberta, filed a claim against Alberta alleging an infringement of treaty rights based on the cumulative effects of development in their traditional territories. A case from 2008 is still before the courts between the Beaver Lake Cree Nation and Alberta.

#### Reconciliation Process

The Alberta government has put in place an Indigenous Reconciliation Initiative, which provides up to \$100,000 in funding for projects that are either "cultural" or "economic" in nature.<sup>9</sup> Canada has recognised Métis right to self-government, and Métis are creating their own government.

#### 2.1.4. Land use

The 2021 land-use/land-cover classification data provided by the Alberta Geology Survey and the Alberta Energy Regulator was used to identify the land use types within the Supply Base Area.<sup>10</sup> This data is publicly available and covers the entire province. Time-series land-use/land-cover datasets provide spatially explicit information regarding land-cover transitions and possible changes in environmental pathways, such as a change from forest to temporary or longer-term industrial use. Land-use/land-cover monitoring helps enable cumulative environmental impact assessment and determine the baseline conditions. This data provides 14 land-use/land-cover classes. Figure 10 shows the distribution of the nine land-use/land-cover types within the Alberta Supply Base Area. The current land-use/land cover types are shown in Figure 11.

<sup>9</sup> [Reconciliation in Alberta](https://www.alberta.ca/reconciliation-in-alberta), alberta.ca, Government of Alberta.

<sup>10</sup> [Land-use/Land-cover Classification of Alberta, Derived from 2020 Sentinel-2 Multispectral Data \(image data, TIFF format\)](https://uatags.aer.ca/land-use-land-cover-classification-of-alberta-derived-from-2020-sentinel-2-multispectral-data), uatags.aer.ca, Alberta Geological Survey and Alberta Energy Regulator.

Figure 10: Distribution of Land-use/Land-cover Types in Alberta

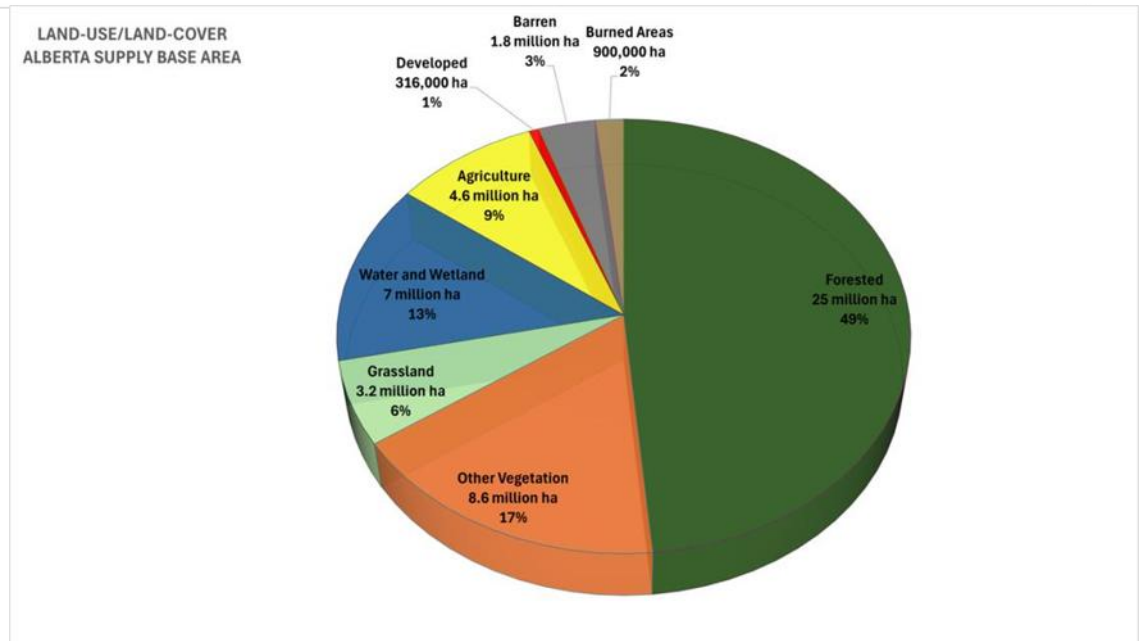
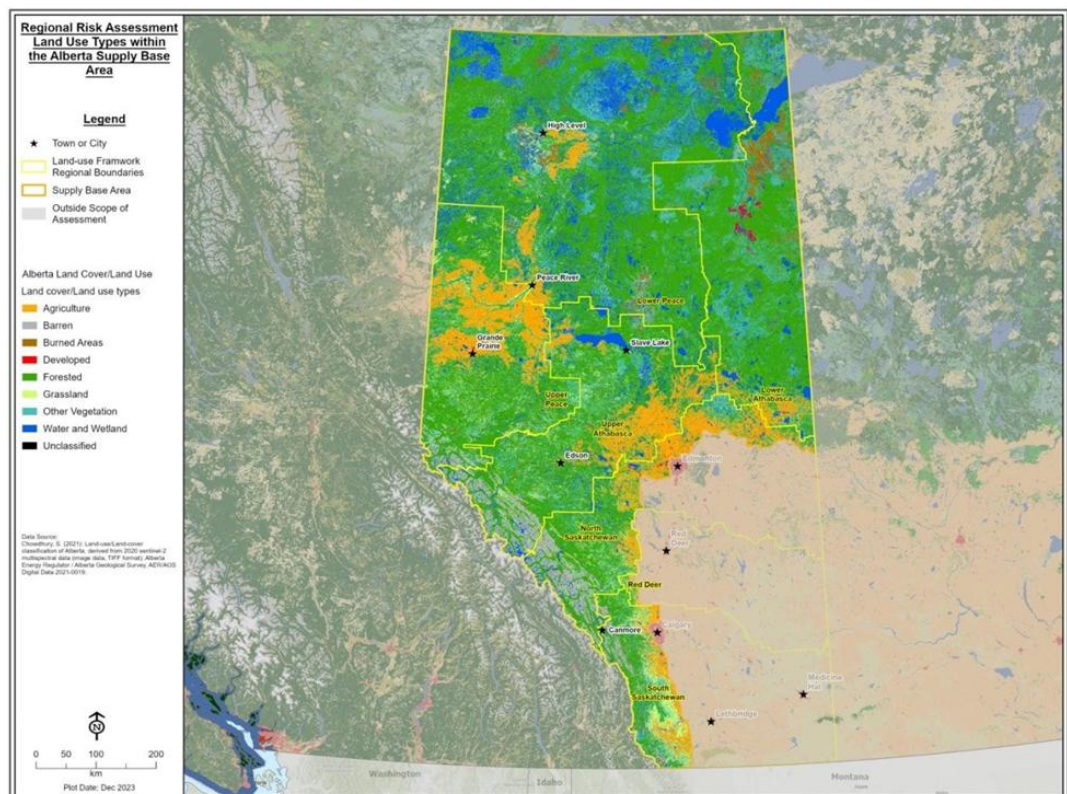


Figure 11: Land-use/Land-cover Types & Land-use Planning Boundaries



### Land Use Planning

Alberta has a regional planning framework that primarily applies to Crown lands. The authority for the administration of Crown land as public land is primarily conferred by the Public Lands Act. The

administration of the provincial parks systems falls under the Provincial Parks Act. The Alberta Land Stewardship Act authorises the government to develop regional land use plans, describes how the planning process is to be undertaken and prescribes the content of plans, the duration, review and renewal. On public lands, the implementation of a regional plan is delivered through existing legislation such as the Public Lands Act, the Forests Act, and the Provincial Parks Act and through existing tools such as integrated resource plans, access management plans, and forest management planning. In 2008, the Government of Alberta introduced a Land-Use Framework to develop a comprehensive land-use planning system for the province. The Land-Use Framework was developed to manage lands and natural resources to achieve long-term economic, environmental, and social goals.<sup>11</sup> Seven strategies were developed to improve land-use decision-making; the first was to develop seven land-use regions and Regional Plans for those regions: Lower Athabasca Region, Lower Peace Region, North Saskatchewan Region, Red Deer Region; South Saskatchewan Region, Upper Athabasca Region, and Upper Peace Region. As of December 2023, two Regional Plans have been approved—Lower Athabasca Region and South Saskatchewan Region; one is in Phase 2 Online Survey—North Saskatchewan Region; the other four have not been started yet. Additional strategies included in the Land-Use Framework are cumulative effects management, conservation and stewardship on private and public lands, reduction of human activities' footprint, the establishment of an information, monitoring, and knowledge system, and inclusion of Indigenous Peoples in land use planning.

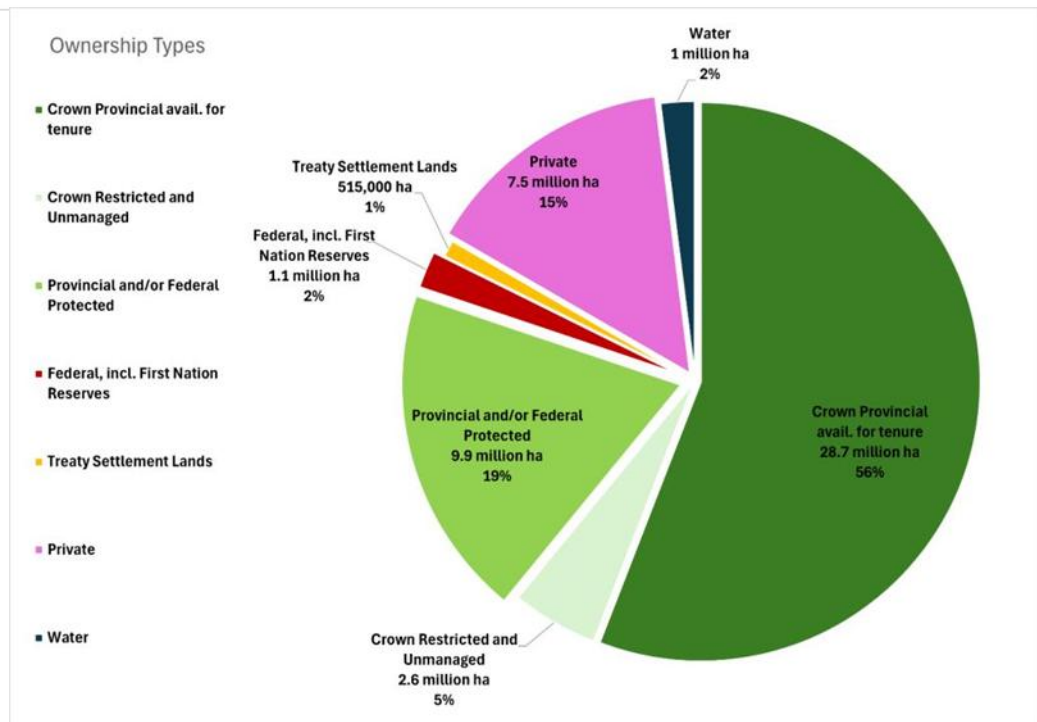
#### 2.1.5. Land ownership

There are four principal types of land ownership in Alberta: federal land (which includes reserves), provincial Crown land, treaty settlement land, and privately owned land. Figure 12 shows the proportion of provincial land in each ownership type.<sup>12</sup> The province has a province-wide parcel fabric, but it is not publicly available. Specific information on these ownership types as related to the forested land base is discussed below in Section 4.6 Forest Sector by Land Ownership.

<sup>11</sup> [Land-Use Planning in Alberta](https://landuse.alberta.ca), landuse.alberta.ca, Government of Alberta, Land Use Secretariat.

<sup>12</sup> [Map of Forest Management in Canada](https://open.canada.ca), Land Management Types: National Forest Inventory Map of Forest Management in Canada, open.canada.ca, Government of Canada, 2017.

Figure 12: Proportion of Land by Ownership Types in the Alberta Supply Base Area



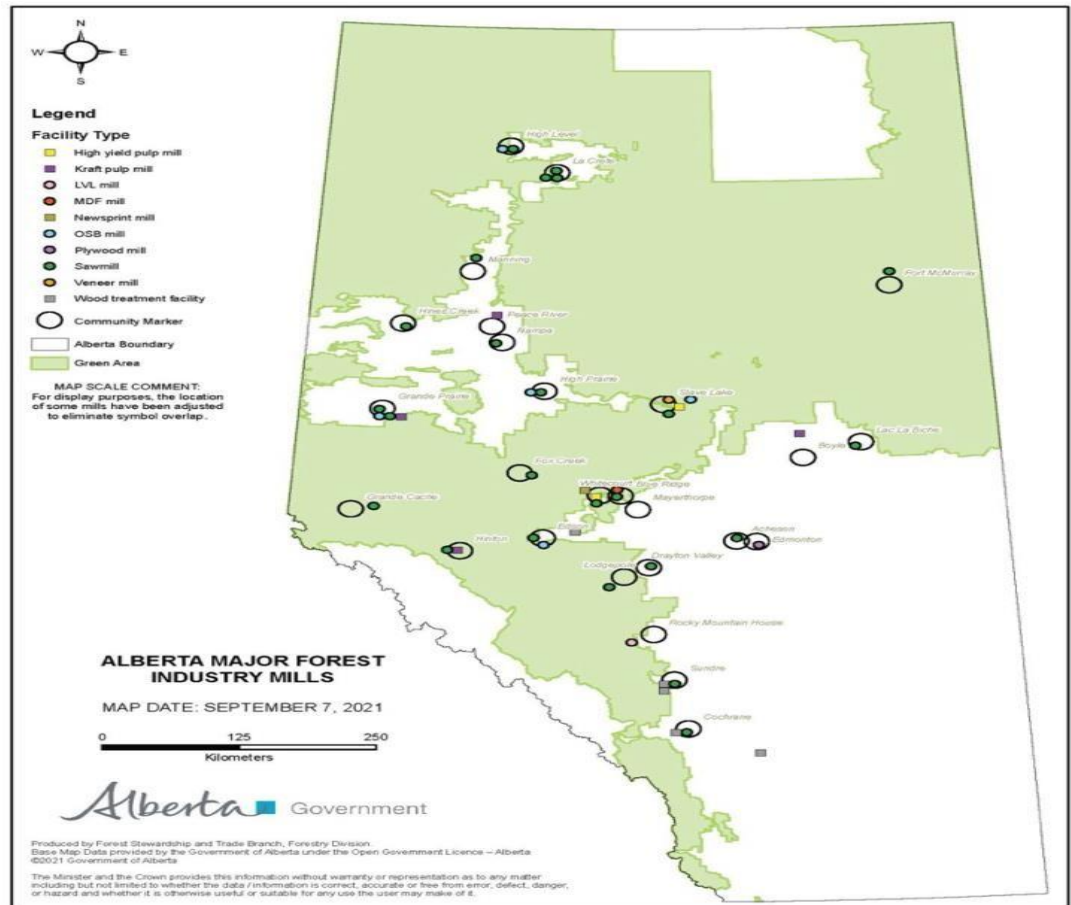
### 2.1.6. Forest sector by land ownership

#### Overview

The provincial land base is divided into two broad categories—the Green Area (the forested portion), and the White Area (the settled portion) (Figure 13).<sup>13</sup> Most of the harvestable Crown forest land in Alberta is within the Green Area and is divided into Forest Management Units (FMUs). The Green Area is public land for multiple uses and integrated resource management. The Green Area covers roughly 58% of the province, located in Northern Alberta and the Eastern slopes of the Rocky Mountains. The White Area is largely private land (75%) and about 25% public land. The White Area is primarily on Alberta’s grasslands and parkland landscapes and is allocated to agriculture, settlements, and other human activities. An extensive portion of the White Area is excluded from the supply base area for this Regional Risk Assessment (RRA).

<sup>13</sup> Alberta Forestry and Parks, [Alberta’s Forest Economy 2023: Handbook of Public Economic and Socioeconomic Accounts](#), 2023.

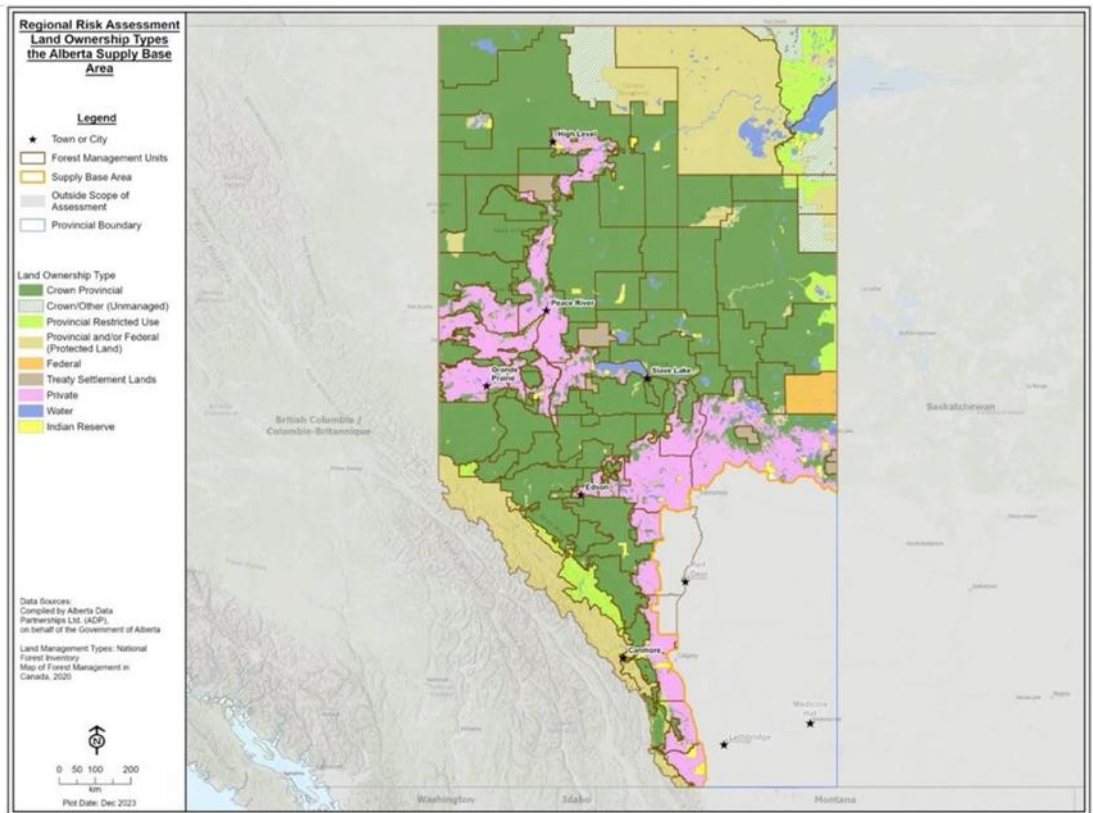
Figure 13: Map of Green Area, White Area and Major Forest Products Mills



Alberta's Supply Base Area is 51.3 million ha, and approximately 28.7 million ha (56%) is provincial Crown land available for long- or short-term tenures.<sup>14</sup> This land management type includes both forested and unforested land cover types. Federal and Crown protected areas is 9.9 million ha (19%), and other provincial Crown land that is either unmanaged or restricted use is 2.6 million ha (5%). Within the Supply Base Area, privately owned is 7.5 million ha (15%); 1.1 million ha (2%) is federal, including First Nation reserve areas; 515,000 ha (1%) is treaty settlement land; and rivers and lakes is 1 million ha (2%). Figure 14 shows the distribution of land ownership within Alberta.

<sup>14</sup> [Map of Forest Management in Canada, Land Management Types: National Forest Inventory Map of Forest Management in Canada](#), open.canada.ca, Government of Canada, 2017, and [Parks and Protected Areas of Alberta](#), Alberta Forestry, Parks and Tourism, Government of Alberta, 2023.

Figure 14: Distribution of Land Ownership in Alberta



### Regulatory Framework

The forests on different ownership types are managed under different regulatory frameworks. The following sections describe the legislative framework, forest management implementation, and conformance monitoring for each of the ownership types: Crown land and private land. Federal legislation includes the Fisheries Act, Migratory Birds Convention Act, and Species at Risk Act. See Annex 3: List of Publications Used for a comprehensive list of applicable federal legislation. Alberta has a comprehensive regulatory framework (Figure 15). The Acts which predominantly govern Alberta forestry include the Forests Act, Regulated Forest Management Profession Act, Natural Resources Conservation Board Act, Forest Reserves Act, Forest and Prairie Protection Act, Water Act, Environmental Protection and Enhancement Act, and Wildlife Act. The Forests Act provides the basis for Crown forest tenure in Alberta. Regulation of forest practices is through the Alberta Forest Management Planning Standard and the Alberta Timber Harvest Planning and Operating Ground Rules. Supplemental to the Acts are regulations, standards, policy directives, interpretive bulletins, and procedures which also govern forestry operations. As outlined in Figure 15, there are many other Acts and Regulations which govern forestry in Alberta.<sup>15</sup>

<sup>15</sup> NCASI18. Canadian Forestry Regulations and Standards, 2021.

All timber harvested and transported for processing must have a TM9 form of origin, which allows for the tracking of the movement of timber in Alberta. TM9 is a requirement for transport from Crown land and private land.

Figure 15: Alberta Forestry Regulatory Framework

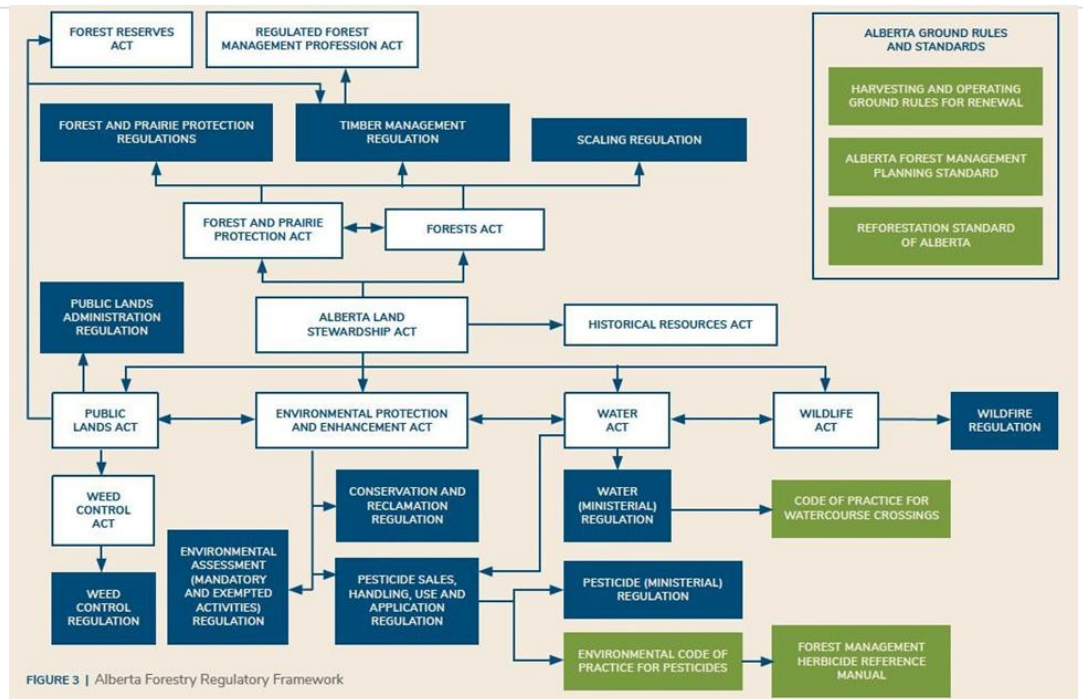


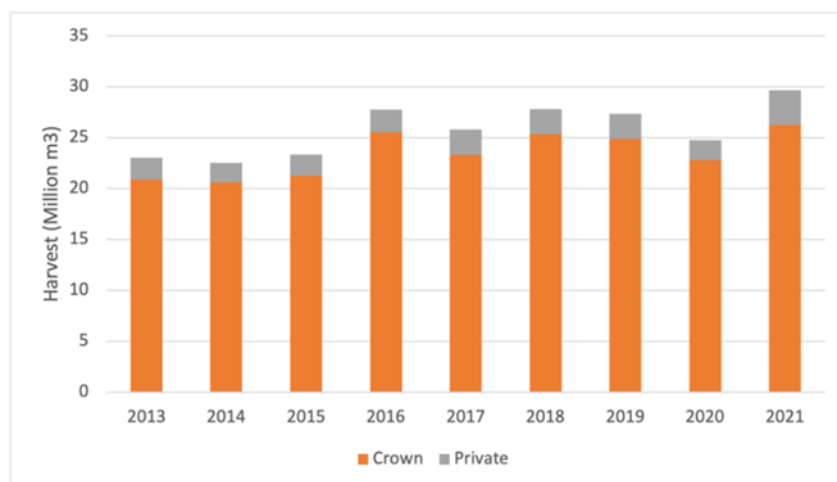
FIGURE 3 | Alberta Forestry Regulatory Framework

### Harvest Levels

The Alberta's Forest Economy 2023 – A Handbook of Public Economic and Socioeconomic Accounts provides data from 2012/13 to 2020/21. Both softwood and hardwood species from Crown land and private land contribute to the provincial wood supply. Figure 16 shows the annual harvest volume (both softwood and hardwood) by landownership from 2012/13 to 2020/21.<sup>16</sup>

<sup>16</sup> Alberta Forestry and Parks, [Alberta's Forest Economy 2023: Handbook of Public Economic and Socioeconomic Accounts](#), 2023.

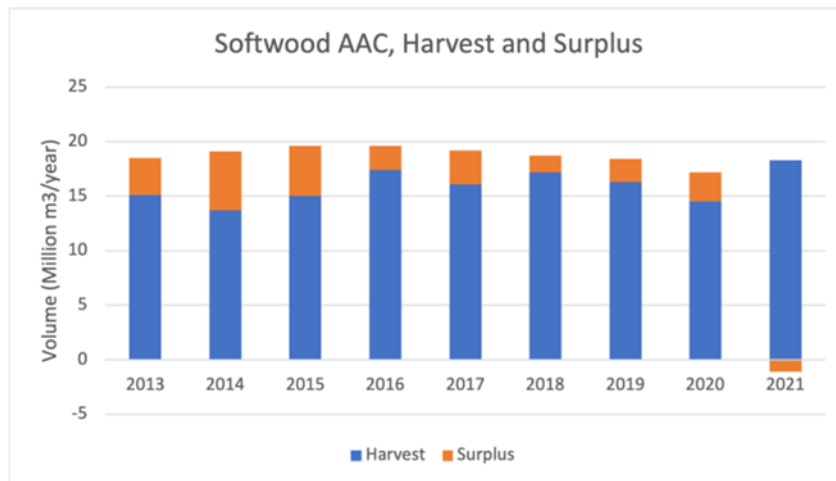
Figure 16: Annual Timber Harvest in Alberta by Ownership



In 2020/21, the reported total timber harvest volume in Alberta was 29.6 million m<sup>3</sup> (91% softwood vs 9% hardwood). 26.3 million m<sup>3</sup> was on Crown land, and 3.3 million m<sup>3</sup> was harvested from private

lands.<sup>17</sup> Crown land harvest represents 89% of the actual provincial harvest in 2020/21. Private land has provided 19% of the hardwood harvest on average since 2012/13. In 2020/21, the softwood harvest exceeded the softwood Annual Allowable Cut (AAC) by 1.1 million m<sup>3</sup> (Figure 17). This is the only year the softwood harvest exceeded softwood AAC.

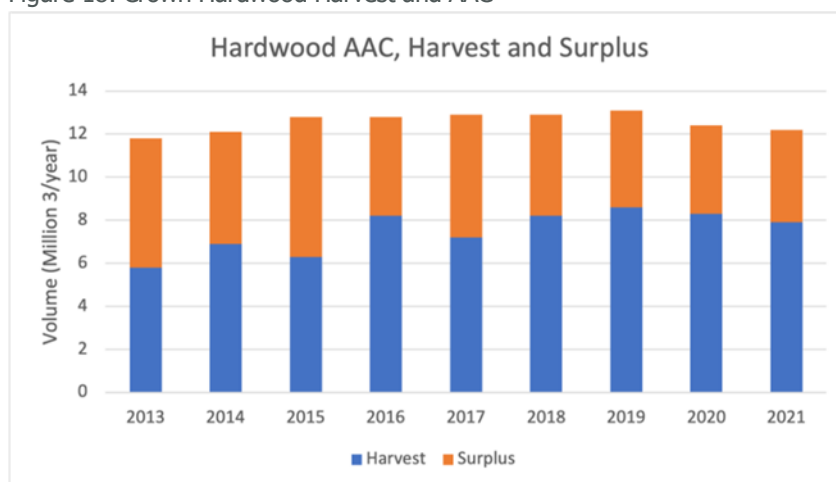
Figure 17: Crown Softwood Harvest and AAC



The hardwood harvest was below the hardwood AAC by 4.3 million m<sup>3</sup> (Figure 18). Alberta’s regulatory regime permits the AAC to be exceeded in individual years if the AAC is not exceeded in the five-year planning period. About two-thirds of the hardwood AAC on Crown land is harvested Figure 18.

<sup>17</sup> Alberta Forestry and Parks, [Alberta’s Forest Economy 2023: Handbook of Public Economic and Socioeconomic Accounts](#), 2023.

Figure 18: Crown Hardwood Harvest and AAC



#### 2.1.6.1. Crown land

##### General

Approximately 56% of land in the Supply Base Area is available for tenure, classified as Crown land, and owned by the province.

#### Governance & Legislation

Crown land forests are managed by Alberta's Ministry of Forests and Parks (MFP). Through the Forests Act and its associated regulations, MFP regulates the harvesting, transporting, and scaling of all timber harvested from Crown land. All harvested timber is tracked to ensure there is no illegal harvesting and royalties owing to the government for harvested Crown timber (timber dues) are completely and accurately invoiced. The Ministry of Environment and Protected Areas (MEPA) regulates environmental legislation, including the Water Act and the Environmental Protection and Enhancement Act. See Annex 3: List of Publications Used for a comprehensive list of applicable legislation.

#### Forest Management Tenure System

MFP, under the Forests Act, is the authority that allocates forest tenures. Tenures are used by the government to allocate specific rights for using Crown forest and resources to other users. There are eight types of tenure that reflect forest uses on Crown land in Alberta. Tenure allocations in Alberta are either area-based or volume-based. Each forest tenure allows the disposition holder specific rights and responsibilities to manage the forest and harvest timber for either short or long periods. The main forest tenure systems are Forest Management Agreements (FMA), timber quotas and timber permits, but the province can issue various permits and licences for the harvest of small volumes. Under the authority of the Forest Act, MFP issues quotas to other timber users that permit the holder to harvest a specified volume or area of a specific species group of timber. MFP issues timber quotas within FMA areas to users of species groups that are not the primary focus of the FMA holder, or simply to provide sufficient timber volume to operate the quota holder's facility. Quotas have terms of up to 20 years and may also be renewed.

#### Annual Allowable Cut & Harvest Levels

In Alberta, the AAC is determined from the FMA holder's analysis of the available timber harvest over a 200-year period. The net land base is an estimate of the forest area where timber harvesting in the management unit is considered both acceptable and economically feasible, given objectives for all relevant forest values, existing timber quality, market values, and applicable technology. The harvest must be even-flow during the simulation period, with no more than 5% variation between adjacent periods. Each FMA and timber quota is assigned an AAC, which is reconciled at the end of every five-to ten-year cut control period. Alberta approves an AAC for conifer and deciduous for each FMU. MFP monitors AACs to ensure the AACs are not being exceeded in a 5-year period.

#### Forest Management Planning & Practices Implementation

Under the Alberta Land Stewardship Act (ALSA), MEPA prepares Regional Plans under the Land-Use Framework that address the integration of resource uses.<sup>18</sup> Currently, two of seven Regional Plans are approved in Alberta. The land-use Framework provides strategic direction that must be incorporated in FMPs located in the approved Regional Plan areas. Five key forest management planning documents are categorized into two types. The first type is strategic planning through FMPs. The second type is operational planning through General Development Plans, Annual Operating Plans (AOPs), and reforestation programs. All forest management planning documents are reviewed and approved by MFP. The Alberta Forest Management Planning Standard (v4.1 April 2006) provides direction for preparing FMPs on Crown land. The Standard is structured to be consistent with the Canadian Standards Association Z809- 02 Sustainable Forest Management Certification. The requirements of an FMA holder are set out in the Forest Management Agreement between MFP and the FMA holder. FMA holders must lead the preparation of 20-year FMPs. The blocks proposed for harvesting during the 20-year term are identified by the Spatial Harvest Sequence and allocated to timber quota and FMA holders for the sequencing of operations. The provincial government prepares FMPs on smaller areas of Crown land not included within FMAs. FMPs are revised every ten years. FMPs contain a detailed description of the

forest management units, a timber supply analysis, reforestation strategies for harvested areas within the FMA, and a list of values, objectives, indicators and targets (VOITs) defined in the Alberta Forest Management Planning Standard. Mandatory VOITs are intended to provide direction for implementing all major strategies of the FMP. Each VOIT consists of a key value, an objective, indicators, and targets that can be used to track progress toward the objective. Mandatory VOITs may be “dynamic” or “modelled.” Dynamic VOITs are measured in the field, and modelled VOITs are considered during FMP development. The mandatory VOITs are combined with voluntary VOITs identified by a Public Advisory Committee. Forest management planning and practices are implemented through the Alberta Timber Harvest and Planning Operating Ground Rules (OGR), under the Timber Management Regulation. THPOGR are the standards used in the planning, implementing and monitoring forest management activities. THPOGR includes timber harvest and reforestation planning requirements for developing operational plans, operational ground rules that govern harvesting and road construction operations and reporting requirements for monitoring and reporting to MFP. General Development Plans project the harvesting, permanent road development and reclamation planned for the next five years, and the process is described in the OGR. FMA and timber quota holders are required to prepare General Development Plans. The Plans include a forecast of the areas scheduled for harvest and provide details regarding road requirements and fish and wildlife issues within the planning area. Plans are intended to guide the integration of activities among different operators.<sup>19</sup> General Development Plans have five-year horizons but are revised and submitted to the government annually. MFP approval of the General Development Plan is required before operations can commence. AOPs detail the harvesting and road-building activities proposed in an operating area for a specific year, as described in the OGR. AOPs must include details of reforestation and fire control plans. AOPs are submitted annually and approved by MFP before operations can commence. Under the Timber Management Regulation, the reforestation program is a component of the AOP and is described in the OGR. The reforestation program is treated as a separate submission from the AOP and is approved by MFP separately. The reforestation program details proposed silviculture prescriptions and treatment schedules for the upcoming year. The reforestation program provides a link between silviculture operations and the approved FMP. Every five years, the FMA holder produces a Stewardship Report, the content of which is prescribed in the Forest Management Standard Interpretive Bulletin: Stewardship Reporting Requirements.<sup>20</sup> A Stewardship Report summarizes the implementation of the FMP over the past five years, compares planned and actual outcomes, reports on monitoring results and discusses progress towards achieving the objectives of the FMP. FMA holders are also required to report on the level of achievement of dynamic VOITs, and if levels of activity were outside of tolerances set by the provincial government, modelled VOITs must also be reported on. If activity levels are within the prescribed tolerances, it is assumed the modelled VOITs are being met. Reporting on voluntary VOITs is optional at the discretion of the FMA holder.

#### Monitoring Forest Practices

Monitoring forest practices focuses on compliance, effectiveness, or how the realised outcomes compare with the anticipated outcomes. Timber disposition holders inspect operations through company management systems to ensure compliance with requirements and regularly assess the effectiveness of harvesting, road construction, and silviculture operations. There are three principal government programs in place to provide additional oversight, Compliance and Enforcement, Forest Operations Monitoring Program (FOMP), Stewardship Reporting.

#### Compliance & Enforcement

Under the Timber and Reforestation Operations Monitoring Directive, timber disposition holders who harvest more than 30,000 m<sup>3</sup>/year under tenure must report forest operations for compliance with the OGR and the approved AOP.<sup>21</sup> Reforestation activities are reported through the reforestation program of the company AOP and submitted electronically to the Alberta Regeneration Information System by May 15th annually, as per the protocols in the Alberta Regeneration Information System Industry

Operations Manual. MFP monitors compliance with forestry-related legislation, regulations, and policy directives. Monitoring is conducted through planned and random audits of forest operations and timber production through field inspections by MFP. MEPA monitors compliance by conducting planned and random audits of activities relevant to the legislation the ministry is responsible for enforcing. Forest companies and individuals are also responsible for self-reporting. If a company is found to be non-compliant, MFP or MEPA will take compliance and enforcement action; including assessing penalties, follow-up action or corrective action plans, seizing timber, or suspending or cancelling timber harvest rights or dispositions. MFP and MEPA must report all contraventions and non-compliances by disclosing the name of the person or company that has broken the law or specific conditions, a description of the contravention, and the penalty amount. The contraventions for the past five years are publicly available on the respective websites.

#### Forest Operations Monitoring Program

MFP staff are responsible for the FOMP. MFP periodically monitors forest operations on Crown land and verifies inspection information received by timber disposition holders. The frequency of FOMP inspections is determined through a risk-rating protocol assessed for the timber disposition or FMA operating area. Non-conformance reports can be issued to timber disposition holders and must be followed up on with corrective action management. The most recent publicly available FOMP Reports are from 2016.<sup>22</sup> FOMP inspection data is still collected and used internally by MFP.

#### Stewardship Reports

Stewardship Reports describe the monitoring program of the company and how objectives from the FMP are met. The Forest Management Planning Standard Interpretive Bulletin: Stewardship Reporting Requirements details the content and expectations for FMA holders and non-embedded quota holders. It is a process which compiles, analyses and reports approved FMP performance results. A Stewardship Report must be submitted every five years following the submission of the FMP. Stewardship Reports determine conformity to the approved FMP commitments, uphold sustainable forest management practices, and standardise provincial stewardship reporting. The Alberta Forest Management Planning Standard lists mandatory VOITs that FMPs must address, which are monitored through the Stewardship Report.

#### Government Reviews & Initiatives

Forest sector strategies are initiatives to support and strengthen the forest industry in Alberta. The main goals of the forest sector strategies are to support forest jobs, secure fibre access, and ensure sustainable forest management. Key actions include the Forest Jobs Action Plan and long-term timber access. Amendments to the Forests Act were implemented in 2021 to reflect the realities of the current forest industry and improve industry competitiveness. The Alberta Crown Land Vision, led by MEPA, guides a modern approach to managing provincial Crown land that better meets the needs of communities, Indigenous Peoples, and job creators without compromising conservation values and recreation opportunities. Through public consultation, it was identified that the current system requires improvements, including continued conservation of Crown land and biodiversity, support for the sustainable use of trails and backcountry land and removal of confusing and conflicting rules. Key priorities include making the land-use system clear and understandable, supporting sustainable funding and partnerships for creation, focusing on outcomes and reducing red tape. The process is ongoing.

<sup>18</sup> [Regional Plans](https://landuse.alberta.ca), landuse.alberta.ca, Government of Alberta, Land Use Secretariat.

<sup>19</sup> [Forest Management Planning](https://alberta.ca), alberta.ca, Government of Alberta.

<sup>20</sup> Government of Alberta, [Forest Management Planning Standard Interpretive Bulletin: Stewardship Reporting Requirements](#), June 2017.

<sup>21</sup> Government of Alberta, Forest Management Branch, [Directive 2006-04: Timber and Reforestation Operations Monitoring](#), 2006.

<sup>22</sup> [Sustainable forest management facts & statistics: monitoring forest operations](https://open.alberta.ca), open.alberta.ca, Government of Alberta.

#### 2.1.6.2 Private forest land

There is 7.5 million ha of privately owned land in the Supply Base Area. The land is used for compact and dispersed residential, agricultural, rangeland, private forestry, commercial, industrial, utility, transportation, and institutional purposes.

##### Legislative Framework

Management and activities related to harvesting of trees on private lands include limited federal and provincial legislation and local government bylaws. See Annex 3: List of Publications Used for a comprehensive list of applicable requirements.

##### Federal

Federal legislation includes the Fisheries Act, Migratory Birds Convention Act, and Species at Risk Act. See Annex 3: List of Publications Used for a comprehensive list of applicable federal legislation.

##### Provincial

Provincial legislation includes the Land Titles Act, Wildlife Act, Soil Conservation Act, Forest Prairie and Protection Act, Water Act, Pesticide (Ministerial) Regulations, Environmental Protection and Enhancement Act, and Municipal Government Act.

##### Local Government

Alberta has three types of municipalities—urban, rural and specialised. Municipal districts (also called counties) are a government form in rural areas of the province that includes farmlands and unincorporated communities. There are 69 counties and municipal districts in Alberta. The Municipal Government Act provides the authority for local governments to develop bylaws unique to the local government and provide the framework for private land. The Act gives local municipalities the power to enact bylaws that can influence or limit logging activities on private land. Some municipal districts have made development permits a requirement for logging private land.

Local government bylaws vary across the province. Rural and remote areas have fewer bylaws and less enforcement capacity. Differences in implementation, verification of compliance, priority, and capacity of enforcement within local governments vary greatly across the province. There is no uniform set of bylaws adopted by local governments in relation to forest management practices, making provincial verification of monitoring and enforcement difficult.

##### Annual Allowable Cut & Harvest Levels

As of March 2024, there is no legal mechanism to regulate the level of harvesting. Therefore, there is no AAC for private land in Alberta. Private land contributes to Alberta's conifer timber supply in proportion to its area, accounting for 3% to 4% of the annual provincial conifer harvest between 2012 and 2020. In 2020, private lands accounted for 25% of the provincial deciduous harvest. Between 2012 and 2019, private land accounted for 16% to 21% of the provincial deciduous harvest. In 2020/21, a total of 0.8 million m<sup>3</sup> of coniferous timber and 2.6 million m<sup>3</sup> of deciduous timber was harvested from private land.<sup>23</sup>

##### Forest Management Planning & Practices Implementation

There is no forest management planning framework on private land in Alberta. The Government of Alberta published a "Woodlot Management Guide for Alberta," which provides basic knowledge of woodlot management for landowners. It encourages landowners to develop goals, objectives, and a management plan for their land. Beneficial Management Practices are listed within the document. The Woodlot Management Guide for Alberta is not mandatory to be used on private land.

##### Monitoring / Compliance & Enforcement of Forest Practices

As of March 2023, there is no formal program to measure the effectiveness of harvesting operations on private land in Alberta. Monitoring is at the discretion of individual landowners and subject to individual goals and objectives for the property. Enforcement of applicable legislation on private land is the responsibility of designated authorities, including regional districts or municipalities, MEPA, and the federal Environment and Climate Change Canada and Fisheries and Oceans Canada. The level of enforcement varies depending on each regional district or municipality's capacity, resources, and priority. In most cases, local government bylaw compliance and enforcement are initiated by public complaints.

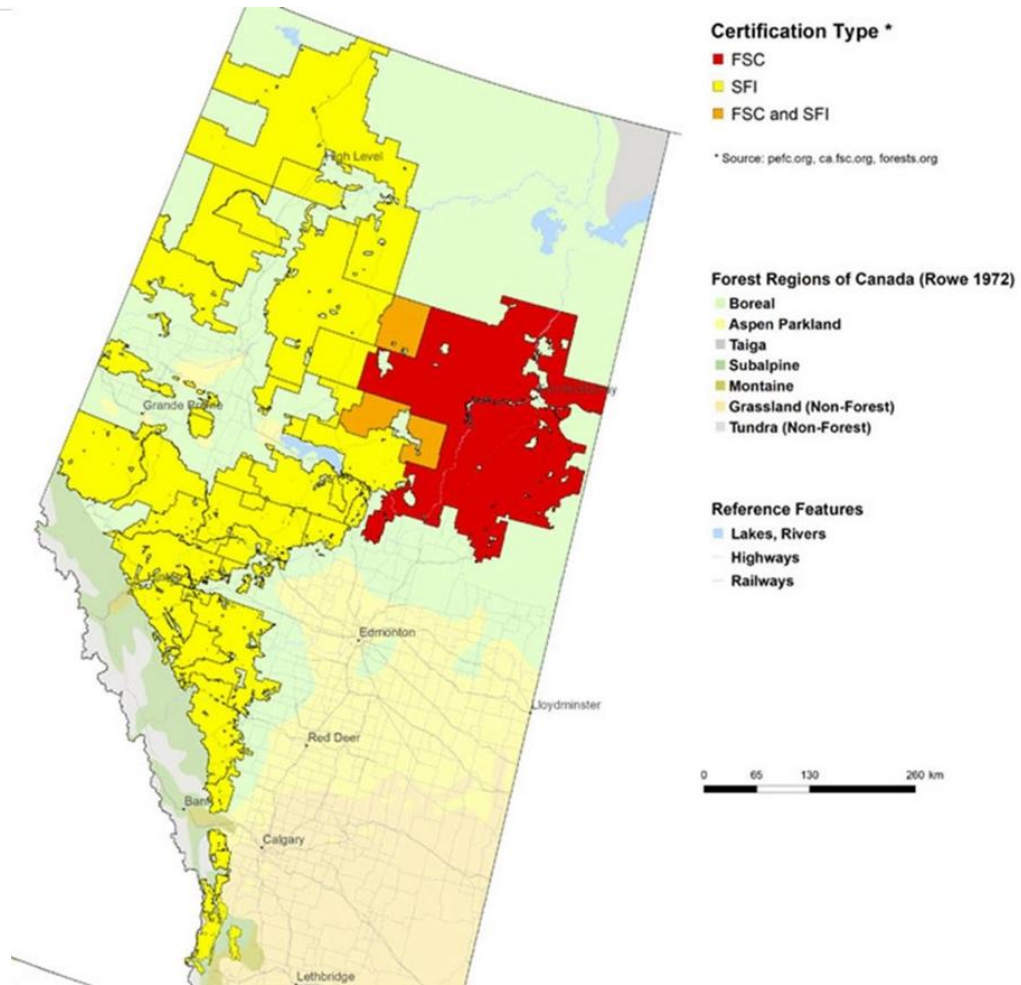
<sup>23</sup> Alberta Forestry and Parks, [Alberta's Forest Economy 2023: Handbook of Public Economic and Socioeconomic Accounts](#), 2023.

#### 2.1.7. Forest certification

Third-party certification supplements existing laws and is undertaken voluntarily by a forestry company or forest owner. Certification provides additional independent assurance that forest products are legally sourced from sustainably managed forests. Forest Management certification verifies the practices on the land. Chain of Custody (CoC) certification verifies the sourcing of fibre (certified and uncertified) along the supply chain.

There are three Forest Management Certification systems within Canada: Canadian Standards Association (CSA<sup>®</sup>), Sustainable Forestry Initiative (SFI<sup>®</sup>) and Forest Stewardship Council (FSC<sup>®</sup>). The CSA and SFI programs are both endorsed internationally by the Programme for the Endorsement of Forest Certification (PEFC). Within Alberta, SFI and FSC certifications apply (Figure 19). Certification Canada annually reports the organisations, hectares certified, and certification systems for all provinces in Canada. Based on data from Certification Canada for 2023 Year-End Status Report, Table 4: Certification by Ownership Type provides the hectares and percentages of associated with ownership type and Table 5: Certification Scheme Proportion by Ownership Type provides the proportion of each certification system.<sup>24</sup>

Figure 19: Certification Types in the Supply Base



<sup>24</sup> Certification Canada, [Forest Management Certification in Canada. 2023 Year-End Status Report Alberta](#), May 2024.

Table 4: Certification by Ownership Type

| Ownership Type                 | Area (ha)         | Certified Area    | % Certified |
|--------------------------------|-------------------|-------------------|-------------|
| Crown Land (avail. for tenure) | 28,661,686        | 22,534,794        | 79%         |
| Private Land                   | 7,520,914         | 0                 | 0%          |
| <b>Total</b>                   | <b>36,182,600</b> | <b>22,534,794</b> | <b>62%</b>  |

Table 5: Certification Scheme Proportion by Ownership Type

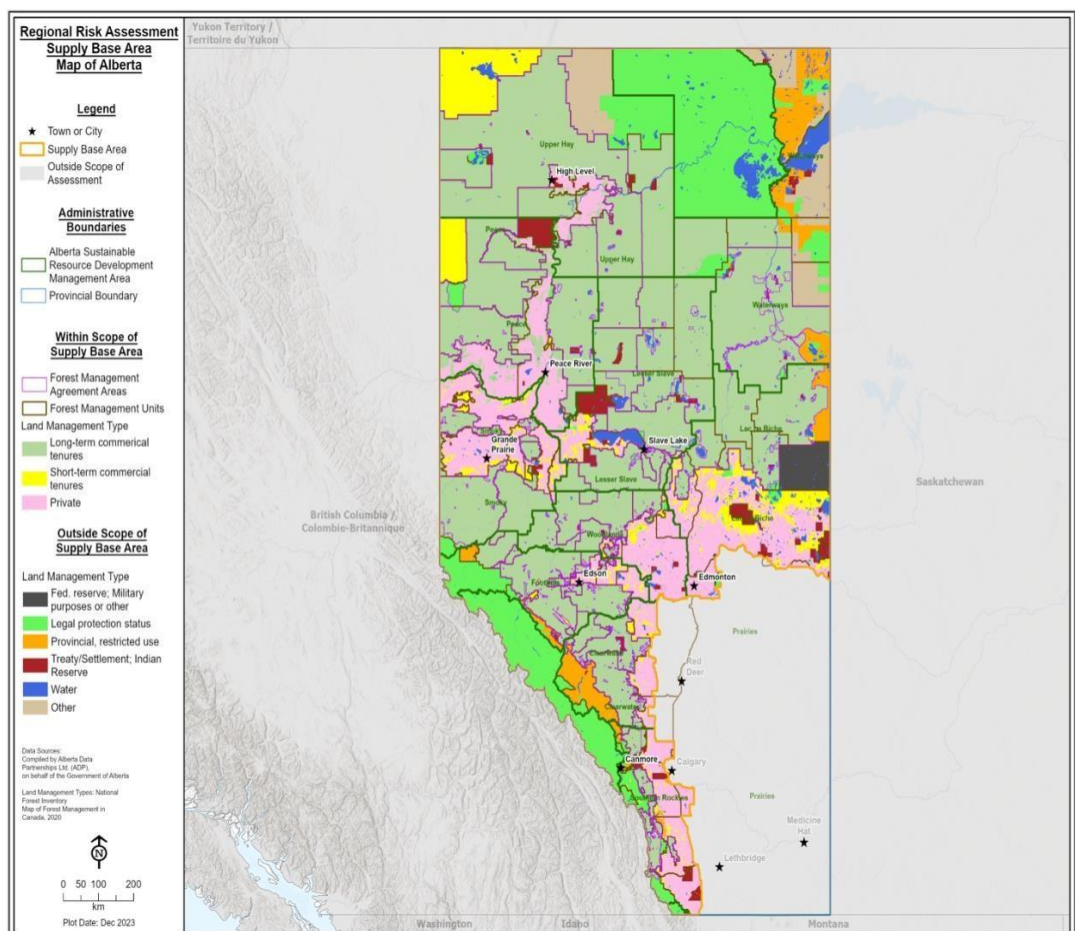
| Ownership Type             | SFI (ha)             | % Certified | FSC (ha)  | % Certified |
|----------------------------|----------------------|-------------|-----------|-------------|
| Crown Land Certification   | 16,655,912           | 74%         | 5,878,882 | 26%         |
| Private Land Certification | 0                    | 0%          | 0         | 0%          |
| <b>Total Certified</b>     | <b>22,534,794 ha</b> |             |           |             |

## 2.2

### Statement of scope and sub-scopes

Figure 1 provides a map of the Supply Base Area within the province of Alberta (AB). The southeast of the province is predominantly unforested and, therefore, was excluded from the supply base area and any calculations provided in this statement of scope or within the sections below. The scope of the assessment is 51.3 million ha, with approximately 41.8 million ha (81%) being public land (provincial and federal land). Total privately owned land is 7.5 million ha (15%); 515,000 ha (1%) is treaty settlement land (1%), and waterbodies (lakes and rivers) occupy approximately 1 million ha (2%) of the total scope of RRA Supply Base Area.<sup>1</sup>

Figure 1: Scope of RRA



The RRA-AB scope is the harvestable forest land base of Alberta.

#### Sub-scopes

Following the requirements in SBP Standard 2 and SBP RRA Procedure, the Working Body evaluated the homogeneity of risk for the region under assessment—Alberta—when determining the scope for gathering information and assessing risk. Establishing sub-scopes will allow for a clear designation of risk and the provision of clear and meaningful mitigation measures.

For most Indicators, the Working Body assessed homogeneous risk based on the ownership types defined in Section 4.6 - Forest Sector by Land Ownership. Based on the different levels of risk across the ownership types, the following three Sub-scopes were defined as

- Crown Land (Section 4.6.1)

- Private Land (Section 4.6.2)

The majority of feedstock is sourced from these above listed ownership types. For some Indicators, the legislative requirements by ownership type did not delineate the homogenous risk for the area under assessment. In these situations, the scope of assessment was identified as provincial. Sourcing feedstock from any other ownership type (i.e., federal land, First Nation Settlements, etc.) would be specified risk. As described under the legislative framework in Section 4.6.2, bylaws vary greatly in the province. The Working Body did not create further Sub-scopes as this level of detail is best verified at the local level (i.e., Supply Base Evaluation).

The Working Body specifically did not delineate Ecoregions as a Sub-scope. Ecoregions are large and often cross more than one jurisdictional boundary, and there are no differences in the regulatory environment based on ecoregions. Ecoregions are assessed as an ecological component of the feedstock source area (i.e., tenure). The Scale of Assessment (i.e., Sub-scope) is defined at the beginning of each Indicator finding. The risk designation at the end of each Indicator finding is based on that Scale of Assessment (See Annex 1: Detailed Findings for Indicators). The Working Body evaluated Sub-scope risk independently. Due to the different types and levels of regulatory oversight for the Sub-scopes, scale, and intensity comparisons amongst the Sub-scopes were not used in determining risk in the RRA for Alberta.

## 2.3

### Overview of the local biomass sector

Alberta’s forest sector is relatively diversified, predominantly softwood lumber and pulp with a growing pellet sector and is highly integrated. In 2021, the most recent year for which data are reported, Alberta wood product revenue (lumber, veneer, plywood, engineered wood products) totalled \$8.2 billion, with pulp & paper totalling \$2.56 billion.<sup>25</sup> Wood pellets revenue was not reported. The majority of what Alberta manufactures is exported. In 2022, Alberta exports of wood products was \$5.73 billion. Alberta exported \$1.75 billion of softwood lumber, \$1.45 billion of oriented strand board and \$1.9 billion of pulp. In 2022, pellet exports totalled \$8.2 million, down from \$11.3 million in 2021 and \$13.5 million in 2020.<sup>26</sup> Roughly 90% of Alberta’s pellet production is exported to Japan, with the remainder being sold within Canada and the US.

#### Alberta’s Pellet Industry

As of March 2024, there are five pellet plants operating in Alberta (Figure 20). Table 6 lists the names, locations, Sustainable Biomass Program (SBP) certification status, and capacity of the pellet facilities in Alberta.<sup>27</sup> In 2024, Alberta facilities accounted for 15.6% of Canadian production capacity.<sup>28</sup>

Table 6: 2024 Capacity of Pellet Mills of Alberta

| Biomass Producer                           | Mill Location | SBP Certified | 2024 Capacity (tonnes/year) |
|--|---------------|---------------|-----------------------------|
| Northern Pellet Partnership – Drax & Tolko | High Level    | Yes           | 200,000                     |
| West Fraser                                | Manning       | No            | 15,000                      |
| La Crete Sawmills                          | La Crete      | Yes           | 80,000                      |
| Vanderwell Contractors                     | Slave Lake    | Yes           | 60,000                      |
| Drax Entwistle                             | Entwistle     | Yes           | 400,000                     |
| <b>Total</b>                               |               |               | <b>755,000</b>              |

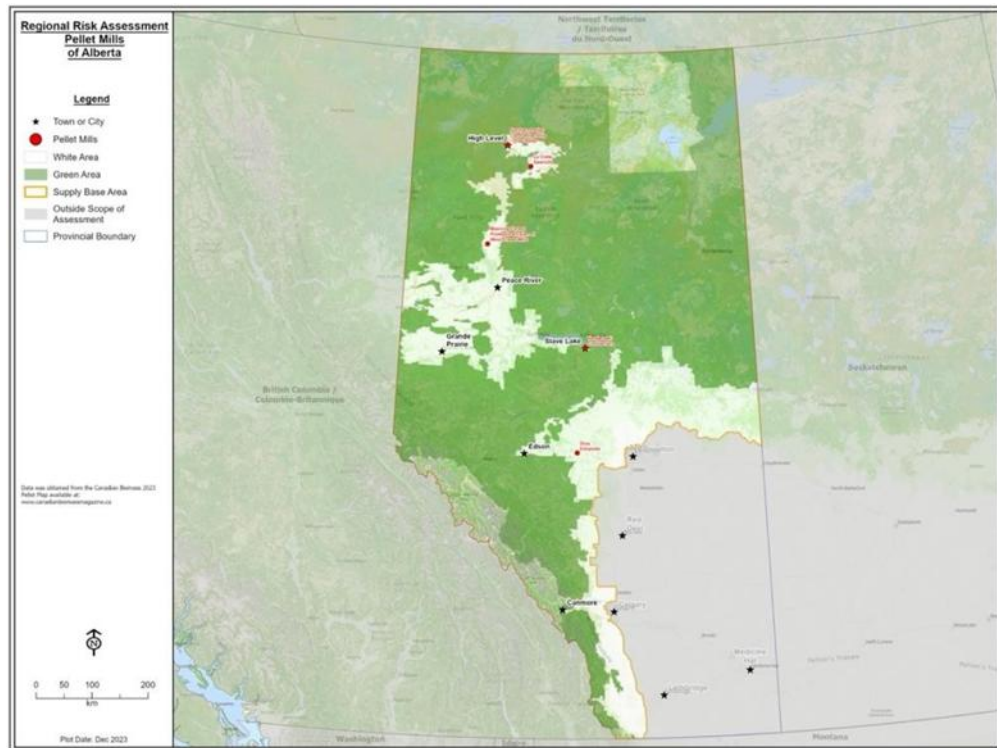
<sup>25</sup> Alberta Forestry and Parks, [Alberta’s Forest Economy 2023: Handbook of Public Economic and Socioeconomic Accounts](#), 2023.

<sup>26</sup> Ibid.

<sup>27</sup> [Canadian Wood Pellet Producer Map](#), pellet.org, Wood Pellet Association of Canada, 2024.

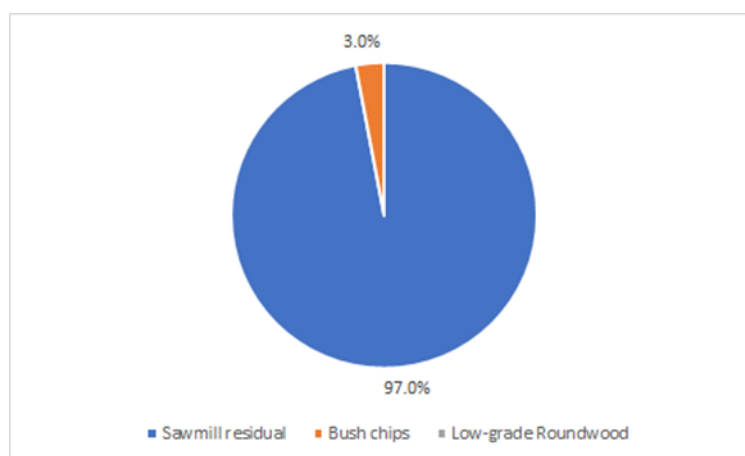
<sup>28</sup> SBP Audit Reports, 2021 to 2023.

Figure 20: Location of Pellet Mills in Alberta



Fibre sourcing was reported in the most recent SBP Audit Reports (spanning October 2021 to April 2023). The Audit Reports show that 97% of the furnish used to make pellets in these facilities came from sawmill or planer residuals (Figure 21).<sup>29</sup> The residuals include chips, shavings, sawdust, and bark, as well as trim ends and other miscellaneous pieces that are ground at the pellet mill. The remaining 3% of the furnish came from low-grade roundwood chipped in the bush. Feedstock comes from residuals of sawmilling and harvest activities and wood that cannot be used for other purposes.

Figure 21: Pellet Input Fibre by Feedstock



<sup>29</sup> SBP Audit Reports 2021 – 2023

## 3 Methodology

### Working Body for the Draft RRA

Brenda Hopkin, RPF of Hopkin Forest Management Consulting Ltd. was selected by the Wood Pellet Association of Canada (WPAC) and approved by the Sustainable Biomass Program (SBP) Secretariat as the Coordinator for the Working Body for the Draft RRA. The Working Body Coordinator was supported by a team of independent natural resource and certification professionals who collectively formed the Working Body. This team satisfied the mandatory qualification requirements of the SBP Regional Risk Assessment (RRA) Procedure (See Annex 2: List of Experts Consulted and Contact of Working Body).

### Applicable Standard

The Working Body methodology addressed the following requirements:

- SBP Standard 1: Feedstock Compliance, v2.0, May 2023
- SBP Standard 2: Feedstock Verification, v2.0, May 2023
- SBP Regional Risk Assessment Procedure, v1.2, May 2021
- Guidance for SBP Standard 1, v1.0, May 2023
- Guidance for SBP Standard 2, v1.0, May 2023
- Glossary of Terms and Definitions, SBP, v2.0, May 2023

### Geographic Scope

The region under assessment (i.e., geographic scope) is the forested land base of the province of Alberta, as discussed in Section 2 Statement of Scope.

### 3.1 Data collection

Necessary data for this RRA is collected mainly through desktop research from a range of sources. The sources include applicable Regional and International legislation and regulations, reports and articles from relevant local ministries and state authorities, NGOs and industry bodies, various databases as well as technical and scientific reports.

The data used in this RRA were validated by cross-checking them with multiple sources wherever possible. Assistance from Forestry Specialists was also used to validate the data. Consultation with experts and stakeholders was also used as data collection.

### 3.2 Selection of indicators to be updated

As this is the first version of the RRA, this section does not apply.

### 3.3 Risk classification

The Working Body followed the risk designation requirements described in SBP Standard 2 and SBP RRA Procedure (v1.2), as well as Guidance for SBP Standard 2. The SBP Guidance describes the REF. The Working Body has incorporated the REF and provides the following methodology.

The following key definitions are paramount in the REF:

- Threat: Anything that can exploit a vulnerability, intentionally or accidentally, and obtain, damage, or destroy an asset (in this case Indicator value). A threat is what needs to be managed to protect the value.
- Risk: Potential for loss, damage, or destruction of an Indicator value because of a threat exploiting a vulnerability.

| Evaluation Criteria                  | Examples by sub-scopes  |   |  |
|--------------------------------------|---|---|--|
|                                      | Crown Land  | Private Managed Forest Land & Other Private Land        | Province                                 |
| <b>Context</b>                       | Describe the context or interpretation of the Indicator as it relates to the scale of assessment &/or forest management. Define what is considered in scope or out of scope by the Working Body. This section may indicate related Indicators.  |   |  |
| <b>Potential Threat/Impact</b>       | Prior to assessing risk, describe the threat/impact (potential or perceived) to legality or sustainability Indicator because of forest management activities or sourcing. This is key to the REF as subsequent evaluation of the Indicator is focused on addressing the threat/impact.  |   |  |
| <b>Regulatory Framework</b>          | Documentation of regulatory framework (as a whole) relative to the threat/impact: reviews applicable legislation. This could include widely accepted best management practices. Different types & levels of governance across the identified Sub-scopes.  |   |  |
| <b>Means of Verification (MoV)</b>   | Regulatory framework  | Limited & program specific regulatory framework         | Regulatory framework                     |
| <b>Implementation Mechanisms</b>     | Describe the mechanisms to support the regulatory requirements by which the organisation completing the forest management activity can demonstrate implementation, conformance, mitigation that address the threat/impact. (i.e., management plans, best management practices (BMP), environmental management systems, industry initiatives, etc.).   |   |  |
| <b>MoV</b>                           | Legislative & BMP mechanisms  | Limited & program-specific legislative & BMP mechanisms | Regulatory framework                     |
| <b>Oversight Framework</b>           | Describe the oversight framework of the Indicator relative to the threat/impact reviews applicable compliance/enforcement or monitoring frameworks.   |   |  |
| <b>MoV</b>                           | MFP Inspections, MFP compliance & enforcement, government &/or NGO analysis/assessments   | Bylaw enforcement                                       | Oversight framework                      |
| <b>Results</b>                       | Describe the current state/condition &/or results of the Indicator relative to the threat/impact. This includes publicly available, current & relevant results &/or reports of monitoring, compliance & enforcement, audits, assessments, etc. This could include information generated from interviews with experts &/or stakeholders.   |   |  |
| <b>MoV</b>                           | Government &/or NGO analysis/assessments  | Bylaw enforcement reports                               | Government &/or NGO analysis/assessments |
| <b>Rationale of Risk Designation</b> | <p>Designated risk is based on evidence gathered in each of the sections listed above and how the evidence manages/mitigates the identified threat/impact. Risk is assessed based on the evaluation of evidence (i.e., means of verification (MoV)) and calibration of likelihood and impact for each of the Indicators. Where there is a high probability that an Indicator has met all the evaluation criteria listed above for a Sub-scope, it is assessed as low risk. Where there is a reasonable likelihood that an Indicator is not being met for any or all the evaluation criteria listed above for a Sub-scope, the Indicator is assessed as specified risk.</p> <p>Where there is insufficient evidence (i.e., MoV) available to assess the risk for any or all the evaluation criteria listed above for a Sub-scope, then the Indicator is assessed as specified risk under the precautionary approach.</p> |   |  |

## 4 Stakeholder consultation

### Stakeholder Consultation Approach

Following the guidance of SBP RRA Procedures (v1.2) Section 5, the following is the approach to Stakeholder Consultation.

#### Phase 1: Development of draft RRA

During the development of the draft RRA, the Working Body reached out to key stakeholders via email, phone, and in-person to obtain and confirm publicly available information regarding Indicators. Key experts included in government, First Nations, biomass producers and ENGOs. Workshops were conducted with government and biomass producers. These contacts became part of the comprehensive stakeholder list.

#### Phase 2: Public Stakeholder Consultation

SBP implemented a 30-day public consultation beginning in November 2024 and ending in December 2024. The SBP Secretariat analysed all the information gathered during the consultation and documented it in the stakeholder consultation report. Modifications to the draft RRA report were completed as appropriate in response to relevant stakeholder feedback.

## 5 Conclusions

| Indicator     | Scope          | Sub-scope      |                |
|---------------|----------------|----------------|----------------|
|               | Provincial     | Crown          | Private        |
| 1.1.1         | Low risk       | -              | -              |
| 1.1.2         | -              | Low risk       | Low risk       |
| 1.1.3         | Low risk       | -              | -              |
| 1.1.4         | -              | Low risk       | Low risk       |
| 1.1.5         | -              | Low risk       | Low risk       |
| 2.1.1         | -              | Low risk       | Low risk       |
| 2.1.2         | -              | Low risk       | Low risk       |
| <b>2.1.3</b>  | -              | Specified risk | Specified risk |
| <b>2.2.1</b>  | -              | Specified risk | Specified risk |
| <b>2.2.2</b>  | -              | Low risk       | Specified risk |
| <b>2.2.3</b>  | -              | Low risk       | Specified risk |
| 2.2.4         | -              | Low risk       | Low risk       |
| 2.2.5         | -              | Low risk       | Low risk       |
| 2.2.6         | -              | Low risk       | Low risk       |
| 2.2.7         | -              | Low risk       | Low risk       |
| 2.2.8         | -              | Low risk       | Low risk       |
| <b>2.2.9</b>  | -              | Low risk       | Specified risk |
| <b>2.2.10</b> | -              | Low risk       | Specified risk |
| 2.2.11        | Low risk       | -              | -              |
| 2.2.12        | Low risk       | -              | -              |
| 3.1.1         | Low risk       | -              | -              |
| 3.2.1         | Low risk       | -              | -              |
| <b>3.2.2</b>  | -              | Low risk       | Specified risk |
| <b>3.2.3</b>  | -              | Specified risk | Specified risk |
| 3.3.1         | Low risk       | -              | -              |
| 4.1.1         | Low risk       | -              | -              |
| 4.1.2         | Low risk       | -              | -              |
| 4.1.3         | Low risk       | -              | -              |
| 4.1.4         | Low risk       | -              | -              |
| 4.1.5         | Low risk       | -              | -              |
| 4.1.6         | Low risk       | -              | -              |
| 4.1.7         | Low risk       | -              | -              |
| <b>4.1.8</b>  | Specified risk | -              | -              |
| 4.1.9         | Low risk       | -              | -              |
| <b>4.1.10</b> | -              | Low risk       | Specified risk |
| <b>4.2.1</b>  | -              | Low risk       | Specified risk |
| 4.2.2         | Low risk       | -              | -              |
| 4.2.3         | -              | Low risk       | Low risk       |
| <b>4.2.4</b>  | -              | Specified risk | Specified risk |
| 4.2.5         | Low risk       | -              | -              |
| <b>4.2.6</b>  | -              | Low risk       | Specified risk |
| <b>4.2.7</b>  | -              | Low risk       | Specified risk |

## Annex 1 Detailed findings for Supply Base Evaluation

### Principle 1 – Feedstock is legally sourced

#### Criterion 1.1 – Operators and operations are legal

|                 |   |
|-----------------|---|
| 1.1.1           | <b>Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.</b>  |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>The intent of this Indicator is to ensure that applicable laws and regulations comply throughout forest planning and operations. There are several factors which are involved in evaluating the extent to which organisations comply with legislation. In politically stable countries two critical factors are a relative lack of corruption and the rule of law. In regions where there is a high degree of corruption and a lack of rule of law there is a higher degree of risk that feedstock sourcing and biomass productions do not comply with applicable and existing laws and regulations.<br/>There is a complex network of legislation governing forestry in Canada. Additional information on compliance with specific legislation is included in each specific Indicator of this Regional Risk Assessment.<br/>For the assessment of this Indicator, the confirmation/verification of legally harvested timber and origin is paramount and interconnected with Indicators 1.1.2 Legal Ownership &amp; Land Use, 1.1.3 Trade Requirements and 1.1.5 Protection from Illegal &amp; Unauthorised Activities.<br/>In regions where there is a high risk of organisations not complying with law there is a higher potential of illegally sourced timber entering the supply chain, environmental damage, and human and labour rights violations.<br/>The Criminal Code of Canada is the principal anti-corruption legislation, prohibiting corruption, bribery, influence peddling, extortion and abuse of office.<br/>The Alberta Ombudsman Act establishes the Alberta Ombudsman’s Office.<br/>The Alberta Public Interest Disclosure (Whistleblower Protection) Act protects public sector employees who report serious wrongdoing within their organisation.</p> <p><b>Enforcement and monitoring</b><br/>The Criminal Code of Canada is administered by the Attorney General of Canada. The Royal Canadian Mounted Police (RCMP) receive complaints and concerns of corruption.<br/>The Code is nationally applicable and is implemented in Alberta through the Ministry of Justice. The Ministry of Justice prosecutes crimes and shares information relative to legal issues.<br/>The Alberta Ombudsman Act is implemented through the Alberta Ombudsman’s Office.<br/>Many international organisations monitor and report on corruption levels around the globe.<br/>The Criminal Code is enforced throughout Canada by the RCMP, local police, and the judicial system.<br/>The Alberta Ombudsman receives complaints of corruption in public systems and conducts independent investigations. The Ombudsman’s Office additionally</p> |

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |  |
|-------------------------------------|--|
|                                     | <p>provides oversight to professional associations, including Regulated Forestry Professionals.</p> <p>Transparency International maintains a Corruption Perception Index which monitors country level corruption globally. In 2022 (the last available report as of September 2023) Transparency International rated Canada 14/180 countries (with one being the least corrupt) and gave it a score of 74/100 (with 100 being the best).</p> <p>GAN Integrity rates country level corruption and in November 2020 (the last available report as of September 2023) stated that “[Canada] possesses clear-cut regulations and transparent, reliable courts.” Forestry was not identified as an industry at risk of corruption.</p> <p>In 2022 (the last available report available as of September 2023) the World Bank rated Canada at the 93rd percentile (with 100 being best) for both rule of law and control of corruption.</p> <p>A 2016 news release from Interpol states that global corruption in forestry accounts for USD 29 billion in global trade.</p> <p>A review of the Ombudsman’s Office 2022/23 Annual Report (the last available report as of September 2023) does not indicate any specific concerns with forestry. An internet review conducted in September 2023 does not indicate there are any concerns with rule of law in forestry in Alberta.</p> <p><b>Risk conclusion and justification</b></p> <p>There is comprehensive federal and provincial legislation governing forestry. Canada is a low corruption country with a high degree of rule of law. Forestry is not identified as a high risk of corruption industry and there is no indication of systemic non-compliance with law in forestry in Alberta. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Supply Base Verifiers</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures, including anti-bribery policies and codes of conducts</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Company regulatory registry</li> <li>• Forest management plans</li> <li>• Best management practices</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Supplier verification program</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>  |

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|                                 |  |
|---------------------------------|--|
| <p><i>Evidence reviewed</i></p> | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Justice Laws. Criminal Code of Canada.</a></li> <li>• <a href="#">NCASI. Canadian Forestry Regulations and Standards. 2021.</a></li> <li>• <a href="#">Royal Canadian Mounted Police. Report Corruption.</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Ombudsman. Annual Report. 2022/2023.</a></li> <li>• <a href="#">Alberta Ombudsman. Homepage.</a></li> <li>• <a href="#">Ombudsman Act</a></li> <li>• <a href="#">Public Interest Disclosure (Whistleblower Protection) Act</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• <a href="#">GAN Integrity. Country Profiles – Canada. 05 November 2023.</a></li> <li>• <a href="#">Interpol. Global corruption in forestry sector worth USD 29 billion a year. 09 December 2016.</a></li> <li>• <a href="#">Organization for Economic Co-operation and Development. Corruption in the Extractive Value Chain. 2016.</a></li> <li>• <a href="#">Sustainable Biomass Program. Guidance for SBP Standard 1: Feedstock Compliance. 28 April 2023.</a></li> <li>• <a href="#">Transparency International. Corruption in the Extractive Industries.</a></li> <li>• <a href="#">Transparency International. Country Data – Canada. 2022.</a></li> <li>• <a href="#">World Bank. Interactive Data Access – Canada. 05 November 2023.</a></li> <li>• <a href="#">World Bank. Worldwide Governance Indicators – Overview.</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>  |
| <p><b>1.1.2</b></p>             | <p><b>Legal ownership of land and resource use rights shall be respected.</b></p>  |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>For the assessment of this Indicator, the confirmation of legally harvested timber and origin is paramount and interconnected with Indicators 1.1.1 Comply with Laws, 1.1.3 Trade Requirements and 1.1.5 Protection from Illegal &amp; Unauthorised Activities. See Section 4.6 Forest Sector by Land Ownership for more information.<br/>Legality of ownership and land use is important in ensuring that the management of the forest, including the harvest of timber, can be conducted in an orderly manner. The threat, should ownership be contested or poorly established, is degradation of both the resource and the timber industry. A lack of clarity regarding permitted land use would have similar effects.</p> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Constitution Act of 1867</li> </ul>   |

## Annex 1 Detailed findings for Supply Base Evaluation

### Provincial

- Bill of Rights
- Public Lands Act
- Forest Act
- Land Titles Act
- Petty Trespass Act
- Mines and Minerals Act

### **Enforcement and monitoring**

Canada's Constitution Act of 1867 gives the provinces jurisdiction over the "development, conservation and management of...forestry resources," and the provinces generally control and manage the non-private land in the province, with the exception of some lands under municipal and federal government jurisdiction. The Alberta Bill of Rights declares the existence of the right to the "enjoyment of property, and the right not to be deprived thereof except by due process of law." The Public Lands Act authorises the Ministry of Environment and Protected Areas (MEPA) to make decisions regarding public land, including Crown land.

On Crown land, the Forest Act, provides the Ministry of Forestry and Parks (MFP) the authority to issue forest management licenses and permits.

For Crown land, under the Forest Act, the terms and conditions of the licences and permits, and of Forest Management Plans where applicable, set out the requirements that a licence or permit holder must adhere to, as well as government responsibilities.

On private land, legal ownership is conferred by the Land Titles Act, managed by the Ministry of Service Alberta and Red Tape Reduction. The Land Titles Act provides the legislative framework for the Ministry to register land related documents that both create and terminate legal rights in property.

The Petty Trespass Act and the Mines and Minerals Act are the regulatory framework which oversees illegal trespass.

The Land Titles Act and the Proof of Identity Regulation regulate land title registration and the registrar of titles. The land registration system used in Alberta operates under the legislative authority of the Land Titles Act. On private land, the legal basis for ownership is established and the land titles registry system. The province is well surveyed. On Crown land, the Alberta government has custody of all original titles, documents and plans and has the legal responsibility for the validity and security of all registered land title information.

The MFP has the responsibility to oversee the licencing and permitting of timber harvesting and the adherence of licensees and permit holders to the terms of those instruments. The Forest Act, as well as Forest Management Agreements, provide direction regarding dispute resolution and the provincial court system is available to handle disputes that cannot be settled otherwise. The rights of private landowners are protected by the judicial system and disputes that cannot be settled by surveys or negotiation are decided in the courts.

The ownership of forest land is surveyed and well-established in Alberta. The system of property rights functions to maintain the rights and benefits of ownership. Ownership is conferred through title.

As of March 2024, there is no publicly available information indicating widespread or systemic non-compliance regarding legal ownership and use rights being respected.

### **Risk conclusion and justification**

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |  |
|------------------------------|--|
|                              | The legal basis for the ownership of land and resource use rights is established. The system of property rights functions to maintain the rights and benefits of ownership and there is no indication of systemic non-compliance. Based on evidence reviewed, this Indicator is designated at low risk for Crown land and private land in Alberta.   |
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Strategic land use planning (i.e. landscape-level)</li> <li>• Forest management plans</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Supplier verification program</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Tenure/licence agreements</li> <li>• Ownership titles &amp; land surveys</li> <li>• Supplier transportation documentation (origin)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with tenure agreement holders</li> </ul> |
| <i>Evidence reviewed</i>     | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution Act of 1867.</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Bill of Rights 2000</a></li> <li>• <a href="#">Alberta Government Land titles web page</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Land Titles Act</a></li> <li>• <a href="#">Mines and Mineral Act</a></li> <li>• <a href="#">Petty Trespass Act</a></li> </ul>   |
| <i>Risk rating</i>           | <p>Crown Land <b>Low Risk</b></p> <p>Private Land <b>Low Risk</b></p>  |

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|                 |  |
|-----------------|--|
| <b>1.1.3</b>    | <b>Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.</b>  |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>There are five applicable legal trade requirements relevant to this Indicator based on the potential areas of export of biomass from Canada:</p> <ol style="list-style-type: none"><li>1. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);</li><li>2. European Union Timber Regulation (EUTR);</li><li>3. UK Timber Regulation;</li><li>4. Japan Clean Wood Act; and</li><li>5. Korea Act on the Sustainable Use of Timbers.</li></ol> <p><u>CITES</u><br/>The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a safeguard against exploitation of endangered species caused by (often illicit) demand in international markets. CITES sets controls on three levels of allowable trade. Appendices I, II and III provide distinct trade restrictions and requirements that must be observed. Any type of wild plant or animal may be included in the list of species protected by CITES, and new species can be listed at any time depending on the degree of endangerment. The additional legality safeguard with this Indicator is covered off under the European Union Timber Regulation (EUTR), the UK Timber Regulation, Japan Clean Wood Act, and Korea Act on the Sustainable Use of Timbers.</p> <p><u>EUTR</u><br/>The EUTR prohibits the placement of timber and timber products on the EU market if harvested illegally under the laws of the country of origin. It requires those who place timber on the EU market to employ a due diligence system to ensure timber was harvested legally. EUTR due diligence means businesses along the supply chain must keep records to facilitate the traceability of the products (i.e., they must maintain chain-of-custody data for the feedstock used).</p> <p><u>UK Timber Regulation</u><br/>The UK Timber Regulation mirrors the EUTR and pertains to wood products imported to the UK.</p> <p><u>Japan Clean Wood Act</u><br/>The Japanese Clean Wood Act is a voluntary registration system for organisations which procure domestic or foreign wood products in Japan. Registered organisations are required to keep documentation of origin for a period of five years.</p> <p><u>Korea Act on the Sustainable Use of Timbers</u><br/>The Korea Act on the Sustainable Use of Timbers requires imports of wood products to have appropriate documentation on origin.</p> <p>Assessment of this Indicator focuses on the compliance of producers to CITES. It also focuses on compliance to the EUTR, UK Timber Regulation, the Japan Clean Wood Act and the Korea Act on the Sustainable Use of Timbers (collectively referred to as the Illegal Harvesting Initiatives) as all of these deal with supply chain due diligence to minimise the risk of the trade of illegally harvested wood.</p> <p>The potential for illegal harvest of wood is further discussed in Indicators 1.1.1 Comply with Laws, 1.1.2 Legal Ownership &amp; Land Use and 1.1.5 Protection from</p> |

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Illegal & Unauthorised Activities.

### CITES

Trade in endangered forest species elevates the threats of extirpation and extinction of commercially valuable species at risk.

### Illegal Harvesting Initiatives

Illegal timber harvesting threatens the integrity of sustainable forest management and may lead to the damage of sites or values, deprives the timber owner of revenue and is often associated with the activities of larger illegal networks.

### CITES

In Canada, CITES is implemented by the federal government through the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA) and the Wild Animal and Plant Trade Regulations. WAPPRIITA regulates the export/import of CITES listed species, including tree species. The Wild Animal and Plant Trade Regulation – Schedule 1 provides a listing of CITES flora and fauna. CITES-listed species may not be imported into Canada without a CITES permit.

### Illegal Harvesting Initiatives

Legal mechanisms, as defined in the Alberta Forests Act and the associated Timber Regulation, ensure that primary forest products are accompanied by a transportation certificate when being transported on public roads from both Crown and private land. This transportation certificate must identify the origin of the primary forest product.

### **Enforcement and monitoring**

### CITES

In Canada, Environment and Climate Change Canada (ECCC) is the lead agency responsible for implementing and administering CITES under WAPPRIITA and the Wild Animal and Plant Trade Regulations. Within ECCC, the Canadian Wildlife Service administers WAPPRIITA and interacts with provincial, territorial and other federal agencies.

ECCC works with a broad range of partners, including the Canada Border Services Agency, to ensure imports comply with CITES and with relevant legislation and regulations in foreign countries for non-CITES species. In Alberta on Crown and private land, the Ministry of Environment and Protected Areas (MEPA), Wildlife Branch has the licencing and enforcement responsibility for wildlife harvesting. MEPA help ensure provincial implementation of WAPPRIITA.

### Illegal Harvesting Initiatives

The Alberta Forests Act and Timber Regulation are implemented by the Ministry of Forestry and Parks (MFP), who provides information on the website and maintains forms to be used for transportation.

### CITES

ECCC oversees and reports publicly on the implementation of WAPPRIITA in Canada.

### Illegal Harvesting Initiatives

MFP oversees the implementation of the Forests Act and Timber Regulation, compliance, and reporting.

### CITES

ECCC reports annually regarding the enforcement of WAPPRIITA. In the 2021 Wild Animal and Plant Trade and Protection Act Annual Report (the last available as of September 2023), 1,269 inspections were conducted, and 194 violations were identified. Three convictions were filed, none related to flora.

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|                                     |  |
|-------------------------------------|--|
|                                     | <p>An internet search conducted in September 2023 did not identify any concerns with the import or export of CITES listed species into or from Alberta.</p> <p><u>Illegal Harvesting Initiatives</u></p> <p>See Indicator 1.1.5 Protection from Illegal &amp; Unauthorised Activities for results on legality of harvest in Alberta.</p> <p>An internet search conducted in September 2023 did not find any concerns with non-compliance of the Alberta Forests Act and Timber Regulations, nor any concerns with forest products exported from Alberta meeting international trade regulations.</p> <p><b>Risk conclusion and justification</b></p> <p><u>CITES</u></p> <p>There is a comprehensive federal legislative framework governing CITES. There is ongoing monitoring and public reporting. There are no tree species on the CITES export list from Canada. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta</p> <p><u>Illegal Harvesting Initiatives</u></p> <p>There is a high level of compliance with law in Canada (see Indicator 1.1.1 Comply with Laws); a low risk of illegal harvesting (see Indicator 1.1.5 Protection from Illegal &amp; Unauthorised Activities); and a well-regulated system of forest product transportation under the Forests Act in Alberta. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Supplier verification program</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Supplier transportation documentation (origin &amp; species)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with experts</li> </ul>  |

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|                                 |  |
|---------------------------------|--|
| <p><i>Evidence reviewed</i></p> | <p><u>CITES</u></p> <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Convention on International Trade in Endangered Species of Wild Fauna and Flora Website</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Government of Canada. <a href="#">Trade in protected species: Canadian act and regulation for wild animal and plant protection.</a></li> <li>• Government of Canada. <a href="#">Trade in protected species: relevant authorities.</a></li> </ul> <p><u>Illegal Harvesting Initiatives</u></p> <p><u>International</u></p> <ul style="list-style-type: none"> <li>• Forest Legality Initiative. <a href="#">Laws &amp; Policies.</a></li> <li>• Timber Trade Portal. <a href="#">Japan Clean Wood Act.</a></li> <li>• NepCon. <a href="#">Basic EUTR: How to Get Started.</a></li> <li>• Korea Forest Service. <a href="#">Korea’s regulation to promote legal timber trade.</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Forests Act.</a></li> <li>• <a href="#">Alberta Timber Regulation.</a></li> <li>• <a href="#">Directive – Timber Forms.</a></li> <li>• Alberta Ministry of Forestry and Parks. <a href="#">Homepage.</a></li> <li>• Government of Alberta. <a href="#">Annual Report Forestry, Parks and Tourism. 2022/2023.</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low risk</b></p>  |
| <p><b>1.1.4</b></p>             | <p><b>Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>Timber harvesting on Crown land and private land is typically completed by contractors, who pay for the right to harvest the timber subject to any requirements in the contract or licence. The price of standing is known as stumpage and is often charged as a rate per cubic metre of timber. Stumpage rates vary by species, grade/quality, and end product. Revenue from the sale of Crown timber is frequently described as a royalty, and the revenue from royalties contributes to overall government revenues. Private owners receive payments from the sale of goods such as standing timber as income. See Section 4.6 Forest Sector by Ownership for more information.</p>   |

## Annex 1 Detailed findings for Supply Base Evaluation

One of the rights of ownership is the right to sell or exchange the owned property, which is done under contract or agreement. If payments are not made or cannot be collected for property that is sold, this undermines the principle of ownership. The specific threat for timber, in the absence of the rule of law, is a loss of revenue and a degradation of both the resource and the timber industry.

### Provincial

- Forests Act
- Timber Management Regulation (Reg 60/1973)
- Municipal Government Act.

Transactions involving timber harvested from private land are governed by contract law.

### **Enforcement and monitoring**

The Forests Act authorises the Lieutenant-Governor to make regulations prescribing how timber dues are determined. The Alberta Ministry of Forestry (MFP) is authorised to set and collect royalties for Crown timber harvested under licence or permit. The Timber Management Regulation provides the methodologies for setting dues rates.

The Alberta government derives revenue from the harvest of Crown timber in the form of royalties. Crown timber is typically scaled at the receiving mill. The scale data is used to calculate the amount of royalties owed to the government—the rates in force at the time the timber is scaled are applied.

Dues rates are set by species group and product type—there is one dues rate for coniferous timber used for lumber, pulpwood and roundwood, another rate for deciduous pulpwood, and separate rates for veneer, oriented strand board bolts and laminated veneer lumber bolts. Dues rates are calculated monthly and are based on end-product price index levels. The Alberta government and the Forest Resource Improvement Association of Alberta collect annual timber dues. The dues are used to fund provincial programs and services and forest improvement activities.

For private land, there is a written contract between the landowner and the timber purchaser that includes a purchase price or a formula for determining the purchase price. The conditions of sale/purchase of private timber, including the payment for the timber, are part of the timber sale contract. These contracts are enforceable through provincial law. Timber harvested on private land is either scaled at roadside or more commonly is measured by weight at the receiving mill.

The Alberta Ministry of Municipal Affairs is responsible for the Municipal Government Act, which stipulates private landowners are required to pay property taxes. Private forest land is assessed for property taxation at fair market value. Property taxes must be up to date when a property is sold.

The Timber Management Regulation sets out penalties for late payment and provides the MFP with options to allow for alternative payment schedules. The Forests Act provides compliance and enforcement mechanisms that are intended to ensure royalties will be paid for Crown timber. The conditions of sale/purchase of private timber, including the payment for the timber, are part of the timber sale contract and are readily enforceable through provincial law. Any disputes that may arise over private timber sales from private land would be addressed through the legal system.

Municipalities have mechanisms to ensure property taxes are paid, including seizure of property. All transport activities, scaling, and processing of scale data is subject to check scaling, scale site inspections, data review, and audit. The provincial legal system is in place for resolving disputes for Crown and private land regarding payments and contracts.

In fiscal 2021/22, the Alberta government and the Forest Resource Improvement Association of Alberta collected \$651 million in timber dues. MFP has the authority to deny approval of harvesting operations on Crown land in instances of non-payment of royalties.

As of March 2024, there is no publicly available information indicating non-payment for harvested timber is happening on Crown land or private land.

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |   |
|------------------------------|---|
|                              | <p><b>Risk conclusion and justification</b></p> <p>There is a comprehensive legal framework with appropriate controls to ensure the payments for Crown timber and harvest rights, including duties, relevant royalties, and taxes related to timber harvesting. Private timber sales are conducted under contract law, which is enforced in Alberta. Municipalities have mechanisms in place to ensure property taxes are paid. There is no indication of widespread or systemic non-compliance with regards to non-payment. Based on the evidence reviewed, this Indicator is assessed as low risk for Crown land and private land in Alberta.</p> |
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Stumpage payment records</li> <li>• Supplier transportation documentation (origin &amp; species)</li> <li>• Supplier invoices (origin &amp; species)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with suppliers</li> </ul>                           |
| <i>Evidence reviewed</i>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Municipal Government Act</a></li> <li>• <a href="#">Alberta's Forest Economy A Handbook of Public Economic and Socioeconomic Accounts</a></li> <li>• <a href="#">Crown Charges Related to Tenure</a></li> <li>• <a href="#">Forests Act</a></li> <li>• Timber Management Regulation</li> </ul>  |
| <i>Risk rating</i>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>   |
| <b>1.1.5</b>                 | <p><b>There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.</b></p>  |
| <i>Findings</i>              | <p><b>Scale of assessment</b></p> <p>Crown Land, Private Land</p>   |

### Analysis

For the assessment of this Indicator, the confirmation/verification of legally harvested timber and origin is paramount and interconnected with Indicators Comply with Laws, 1.1.2 Legal Ownership & Land Use, and 1.1.3 Trade Requirements. Illegal timber harvesting threatens the integrity of sustainable forest management and may lead to the damage of sites or values, and may deprive the timber owner of revenue.

#### Provincial

- Forests Act
- Timber Management Regulation
- Land Titles Act and Regulations
- Mines and Minerals Act
- Public Lands Act
- Water Act
- Traffic Safety Act
- Titles Act
- Proof of Identity Regulation
- Public Service Act
- Petty Trespass Act

### Enforcement and monitoring

#### Provincial

The Timber Management Regulation ensures primary forest products are accompanied with transportation certification of origin (timber licence, permit, or quota) when being transported on public roads from both Crown and private land. Every load of timber must be accurately accounted for by either using the TM9 haul form or approved equivalent.

#### Crown Land

The Forests Act, overseen by the Alberta Ministry of Forests and Parks (MFP), ensures timber is harvested in compliance with licence requirements (management agreements, timber permits, or licences and timber quotas). The Timber Management Regulation ensures primary forest products are accompanied with transportation certification of origin (timber licence, permit, or quota) when being transported on public roads.

On Crown land, a timber disposition holder must harvest timber subject to a Forest Management Plan (FMP), associated regulations, and government approval and permits administered by MFP. MFP is also responsible for authorising scale sites and mass scaling programs in the province. Forest companies and individuals are required to report illegal activity, encroachment, or trespass, to the Crown authority.

The Alberta Ministry of Transportation and Economic Corridors is responsible for the delivery of the provincial log haul program to mills in Alberta. The Ministry liaises with municipalities on the movement of regulated and oversize vehicles on municipal roads. Weigh scales, facilities, and the methods of dues payment must be approved by the government prior to commencing measurement of Crown resources. Every load of timber must be accurately accounted for by either using the TM9 haul form or approved equivalent.

## Annex 1 Detailed findings for Supply Base Evaluation

### Private Land

On private land, the landowner is responsible for supervision of illegal activity, encroachment or trespass. Common law ensures the right of property owners to make contracts to sell or otherwise dispose of timber on private land and these laws are rigorously enforced. Any disputes that may arise over other private land timber sales would be addressed through the provincial legal system.

Reporting of encroachment or trespass is enforced by government agencies, municipalities, or police through general civic or commercial law on Crown land and private land.

### Crown Land

On Crown land, MFP monitors compliance through planned and random audits of forest operations and timber production. Forest companies and individuals self-report. MFP has the authority to penalise, seize timber, or suspend timber harvest rights or dispositions. MFP's Commercial Vehicle Enforcement Branch ensures that commercial vehicles comply with federal and provincial legislation.

The Alberta government, via peace officers, can request required documents which are required to be in a vehicle, including a load slip. MFP is responsible for examination and licensing of scalers, and assess compliance through site inspections, check scaling, and audits. Non-compliances are reported quarterly and annually by MFP and Ministry of Environment and Protected Areas (MEPA).

### Private Land

On private land, oversight is on the landowner's recognisance.

Non-compliances are reported quarterly and annually by MFP and MEPA.

### Crown Land

The 2023 Forests Act contravention report indicated 12 contraventions, two of which were related to the unauthorised harvest of timber. The 2022 Forests Act contravention report indicated 15 contraventions; however, none were related to illegal harvesting. No unauthorised harvest contraventions were reported in 2020 or 2021. As of March 2024, there is no publicly available information indicating widespread or systemic occurrences of resource extraction conflicts, encroachment, or trespass on Crown land.

### Private Land

There were no non-compliances reported by MFP and MEPA related to private land in Alberta from 2018 to 2023. As of March 2024, there is no publicly available information indicating widespread or systemic occurrences of resource extraction conflicts, encroachment, or trespass on private land.

### **Risk conclusion and justification**

There is a comprehensive legal framework with appropriate controls to protect from unauthorised and illegal activities related to timber harvesting. Government compliance programs monitor and track infractions. There is no indication of widespread or systemic non-compliance with regards unauthorised and illegal activities. Based on evidence reviewed, this Indicator is designated at low risk for Crown land and private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |   |
|-------------------------------------|---|
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Supplier transportation documentation (origin &amp; species)</li> <li>• Supplier invoices (origin &amp; species)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with suppliers</li> </ul> |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Land Titles Act</a></li> <li>• <a href="#">Proof of Identity Regulation and Handling of Documents Regulation</a></li> <li>• <a href="#">Mines and Minerals Act</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Water Act</a></li> <li>• <a href="#">Public Service Act</a></li> <li>• <a href="#">Petty Trespass Act</a></li> <li>• <a href="#">Scaling Standards of Alberta</a></li> <li>• <a href="#">Guide to Log Haul in Alberta</a></li> <li>• <a href="#">Traffic Safety Act</a></li> <li>• <a href="#">Compliance and Enforcement Branch Forests Act Contraventions– MFP</a></li> <li>• <a href="#">Compliance and Enforcement Branch Annual Reports - MEPA</a></li> </ul>                         |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>   |

**Principle 2 – Feedstock sourcing does not harm the environment**

**Criterion 2.1 – Biodiversity is maintained or enhanced**

|                        |  |
|------------------------|--|
| <p><b>2.1.1</b></p>    | <p><b>Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.</b></p>   |
| <p><i>Findings</i></p> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>Biodiversity is defined as the variety of and natural processes that maintain ecosystems, genes, and species on earth. Biodiversity is not measurable. Due to its complexity, the most effective way to assess biodiversity maintenance or enhancement is through proxies.<br/>In Criterion 2.1, the associated Indicators—2.1.1 Key Eco/HCV Identified, 2.1.2 Key Eco/HCV Threats ID &amp; eval, 2.1.3 Key Eco/HCV Maintained or Enhanced— use key species, habitats, ecosystems, and areas of high conservation value (HCV) as proxies for sustaining biological richness. Criterion 2.1 is a nested hierarchy that evaluate sustenance at two scales.<br/>Landscape-level Biodiversity Values (Coarse scale)<br/>Key components of landscape-level biodiversity values include forests that contain concentrations of biological diversity and critical habitat for wide-ranging species. As well as large landscape-level ecosystems (&gt;5,000 ha) and/or Intact Forest Landscapes (&gt; 50,000 ha).<br/>Stand-level Biodiversity Values (Medium/Fine Scale)<br/>Key components of stand-level biodiversity values include forests that contain concentrations of critical habitat for species with relatively small home ranges, rare, threatened and endangered (RTE) ecosystems and key habitat attributes. Key habitat attributes provide structures that sustain forest dwelling species such as large live and dead trees, large coarse woody debris, and complex stand structure.<br/>The scope of Indicator 2.1.1 Key Eco/HCV Identified—assesses whether the biodiversity values are identified. Indicator 2.1.1 is assessed at the provincial level.<br/>Indicator 2.1.2 Key Eco/HCV Threats ID &amp; Eval—assesses whether, once identified, appropriate actions are being taken to identify and evaluate threats/impacts that may compromise biodiversity values. Indicator 2.1.2 is assessed at the provincial level.<br/>Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced—assesses whether identified threats/impacts are mitigated, and biodiversity values are maintained or enhanced. Indicator 2.1.3 is assessed at the sub-scope level: Crown land and private land.<br/><u>Landscape-level Conservation Values (Coarse Filter)</u><br/><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Species at Risk Act (SARA)</li> <li>• Migratory Birds Convention Act (MCBA)</li> <li>• Fisheries Act</li> <li>• Canada National Parks Act</li> </ul> |

## Annex 1 Detailed findings for Supply Base Evaluation

### Provincial

- Alberta Land Stewardship Act (ALSA)
- Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act
- Provincial Parks Act

### Stand-level Biodiversity Values (Medium/Fine Scale)

### Federal

- Species at Risk Act
- Migratory Birds Convention Act
- Fisheries Act

### Provincial

- Alberta Land Stewardship Act (ALSA)
- Forests Act
- Wildlife Act
- Wildlife Act Regulation
- Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act
- Provincial Parks Act

### **Enforcement and monitoring**

#### Landscape-level Conservation Values (Coarse Filter)

At the federal level, the Species at Risk Act (SARA) enables the federal government to identify species at risk (SAR). The federal SARA is jointly implemented through:

- Environment and Climate Change Canada (ECCC) for overall coordination of SARA as well as Migratory Birds Convention Act (MBCA) for migratory bird SAR;
- Fisheries and Oceans Canada (DFO) for aquatic SAR;
- Parks Canada for SAR in national parks and historic sites.

Species assessments are made by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), a committee of wildlife experts. COSEWIC makes its list public and forwards it to Canadian Endangered Species Conservation Council along with a rationale for each designation. The Council determines and coordinates the most effective response actions.

The MBCA includes a Schedule 1 to identify and list key species which overlaps with the SAR list.

ECCC officially identifies and maintains the SAR Public Registry for identified species that fall under SARA.

At the provincial level, for wide ranging species at risk, the Alberta Endangered Species Conservation Committee (ESCC) established under the Alberta Wildlife Act reports to the Ministry of Environment and Protected Areas (MEPA). ESCC's tasks are to identify, review and maintain the provincial endangered species listing. ESCC identifies its provincial SAR using the federal SAR Public Registry. ESCC conducts a three-stage process—general status assessment, detailed status assessment, and prevention strategies. The Alberta Wildlife Act SAR list is assessed, and species are identified as candidates for recovery planning as required under SARA at the detailed status assessment level.

## Annex 1 Detailed findings for Supply Base Evaluation

National parks, provincial parks, and protected areas identified in Alberta provide for conservation of biological diversity and ecosystem services for large landscapes. These parks and protected areas vary in size and conservation values.

At the federal level, National Parks, under the Canada National Parks Act, are the conservation tool used to conserve large landscapes and habitat of species at risk. The federal government under SARA uses multi-species recovery planning to protect species at risk and associated ecosystems within the national parks.

At the provincial level, under the Alberta Land Stewardship Act, MEPA uses a Land Use Planning framework and develops regional land use plans for seven land use regions as a guide for conservation planning and future development. Additionally, MFP identifies parks under the Provincial Parks Act and MEPA identifies protected areas under the Wilderness Areas, Ecological Reserves, Natural Area, and Heritage Rangelands Act. Both parks and protected areas are key components of conservation and environmental protection of large landscapes.

The Alberta Biodiversity Monitoring Institute (ABMI) provides reporting and mapping of the Biodiversity Intactness Index and identifies the distribution of Human Footprint by natural regions which is an indirect assessment of landscape level ecosystems intactness. ABMI also conducts a province-wide wetland identification with a spatial inventory and wetland complex mapping. The wetland complexes are implemented through MEPA Land Use Regional Plans and the Water Act.

fRI Research's Healthy Landscape Program, identifies and tracks landscape level changes in terms of natural disturbance regimes and ranges of natural variation to guide landscape level management. Global Forest Watch completes analysis and produces publicly available maps that spatially identify Intact Forest Landscapes globally, including the province of Alberta.

### Stand-level Biodiversity Values (Medium/Fine Scale)

Much of the legislation and implementation mechanisms described in landscape- level biodiversity values above are applicable to stand-level biodiversity values identification.

At the provincial level, for species at risk with small home ranges, the Wildlife Act enables MEPA to identify endangered species and habitat. The ESCC evaluates SAR habitat needs and key ecological attributes to sustain persistence as part of the status assessment process.

MEPAs Alberta Conservation Information Management System (ACIMS) provides regional and stand level identification of RTE ecosystems. ACIMS uses the NatureServe North American protocol to rank identified ecosystems globally and provincially.

The Alberta Biodiversity Monitoring Institute (ABMI) provides mapping that identifies species occurrence. The Alberta Fish and Wildlife Internet Mapping Tool also identifies key wildlife observation locations and reports.

Key habitat attributes provide structures that are needed to sustain forest dwelling species and biodiversity at the stand level. Key habitat attributes can include large live and dead trees and large coarse woody debris. These attributes accumulate as forests age such that the full suite of attributes and complex forest structure are present in old forests.

MFP's Alberta Forest Management Planning Standard (AFMPS) and Alberta Timber Harvest Planning and Operating Ground Rules (OGRs) identify the key habitat attributes and old forests to be retained at the both the landscape-level and stand-level. Attributes identified in the AFMPS, Annex 4 and OGR, Section 2.6 (Stand structure) and Section 2.8 (Species of management concern) include but not limited to maintaining standing dead (snags), live residual trees, retention patches, structural complexity and old forest retention, as well as habitat requirements of species of special management concern. MFP defines old forests as stands 40 years older than mean annual increment culmination age. Old forests can be identified using the MFP Alberta Vegetation Inventory (AVI) with age class and stand structure. Much of the listed federal and provincial oversight is applicable for both landscape- level and stand-level biodiversity values.

At the federal level, COSEWIC oversees SARA species, critical habitats and updates SARA listings annually. DFO oversees the Fisheries Act, ECCC oversees the MBCA, and Parks Canada oversees the Canada National Parks Act.

## Annex 1 Detailed findings for Supply Base Evaluation

At the provincial level, the Land-use Secretariat has oversight of the development and coordination of regional land use planning including new conservation areas. At the provincial level, ESCC, under MEPA oversees the species at risk including the Federal SARA, Alberta Wildlife Act. MEPA and ACIMS oversees RTE ecosystems. MEPA oversees conservation and protected areas under the Wilderness Areas, Ecological Reserves, Natural Area, and Heritage Rangelands Act. MFP oversees provincial parks under the Provincial Parks Act. MFP under the Forests Act oversees planning and practices related to biodiversity values. ABMI oversees Biodiversity Intactness Index, wetland inventory, and species occurrence mapping, whereas fRI Research oversees the Healthy Landscape Program. Global Forest Watch is responsible for oversight of Intact Forest Landscapes identification process.

### Landscape-level Conservation Values (Coarse Filter)

ECCC SAR Registry identifies most current species at risk for each province. ECCC publishes the SAR Public Registry annually.

COSEWIC produces species assessment reports and candidacy evaluations for inclusion in SARA. The Canadian Endangered Species Conservation Council publishes the General Status of Species of Canada report every five years.

ECCC MBCA Schedule 1 identifies migratory bird species at risk requiring protection under the MBCA.

Under the Wildlife Act, the Schedule 6 of the Wildlife Regulation identifies species assessed as endangered including animals, plants and fish.

MEPA maintains a provincial species at risk listing, as well as publishes a Species Status Report (Species at Risk Assessed in Alberta). The report includes a listing of endangered and threatened species currently listed under Alberta's Wildlife Act and other species assessed by the ESCC.

In Alberta, species at a significant global, regional or national level and wide- ranging species at risk include Woodland caribou and grizzly bear. Critical habitat for these wide-ranging species has been identified. With regards to large landscapes, the protected area in federal and provincial land includes national and provincial parks, wilderness areas, ecological reserves, wildland provincial parks and natural areas. Although there is over 9.07 million ha provincially protected, approximately 5.3 million ha legally protected areas are in the Green Zone. The Parks and Protected Areas dataset contains Parks and Protected Area boundaries for sites administered by the Government of Alberta. National parks, because of their similar conservation intent, are also included.

ABMI uses the Human Footprint Analysis with species occurrence data to report Biodiversity Intactness Index for the province on regions and species of interest. The ABMI Status of Human Footprint in Alberta (2023) reports of the three most forested regions had 34% (Foothills), 20% (Boreal) and 6% (Rocky Mountain) human footprint. Current data and analysis are publicly available on the ABMI website. In addition, ABMI provides province-wide wetland identification with a spatial inventory and wetland complex mapping. This mapping is publicly available on the ABMI website.

Global Forest Watch's most current report (2022) identifies and maps 5.2 million ha of Intact Forest Landscapes in Alberta, in both the timber harvesting and non-timber harvesting landbase.

### Stand-level Biodiversity Values (Medium/Fine Scale)

Some of the above discussed results in landscape-level biodiversity values are applicable to stand-level biodiversity values identification. Stand-level habitat for small home range species required in the Wildlife Act (Schedule 6) and Federal SAR are identified in recovery plans.

ACIMS identifies globally and provincially vulnerable, imperilled, or critically imperilled ecosystems (RTE ecosystems). ACIMS ecosystems was last updated in 2020.

ABMI's interactive mapping tool identifies species occurrences, on sites for amphibians, birds, bryophytes, lichens, mammal, invertebrates, and vascular plants.

Key habitat attributes and old forest are identified in MFP's Alberta Forest Management Planning Standard (AFMPS) and Alberta Timber Harvest Planning and Operating Ground Rules (OGRs). Required attributes are listed in the AFMPS, Annex 4 and OGR, Section 2.6 (Stand structure) and Section 2.8

(Species of management concern). Requirements for the identification of key habitat attributes and old forest are presented following values, objectives, indicators and targets.

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |   |
|-------------------------------------|---|
|                                     | <p><b>Risk conclusion and justification</b></p> <p>There is a comprehensive federal and provincial regulatory framework with appropriate protocols and experts to identify landscape-level and stand-level biodiversity values. Government agencies, both at the federal and provincial level, are responsible for the process of identification, including the determination of the presence of relevant biodiversity values at the landscape-level or the stand-level. Government agencies provide oversight for the identification determination, as well as appropriate monitoring and/or adaptive management to adjust protocols, listings and/or presence. Government websites and resources include listing, reports, analysis, and spatial information (subject to confidentiality) demonstrating that landscape-level and stand-level biodiversity values such as key species, habitats, ecosystems, and areas of high conservation value are identified. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• SAR Public Registry – SARA listed species, critical habitat &amp; recovery plans</li> <li>• Endangered Species Status reports</li> <li>• National and Provincial Parks boundary maps</li> <li>• Protected areas boundary maps and protection measures</li> <li>• Regional Land Use Plan</li> <li>• Global Forest Watch Intact Forest Landscape statistics and mapping</li> <li>• Alberta Fish and Wildlife Internet Mapping Tool key wildlife observation locations and reports</li> <li>• ABMI mapping of species occurrences</li> <li>• ABMI Biodiversity Intactness Index – reports and maps</li> <li>• ACIMS threatened ecosystems list</li> <li>• Alberta Vegetation Inventory (AVI) and Ecological classification mapping</li> <li>• Provincial Geospatial Centre – GIS data, shapefiles and/or maps (static and interactive)</li> </ul>   |

## Annex 1 Detailed findings for Supply Base Evaluation

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|--------------------------|--|
| <i>Evidence reviewed</i> | <p><u>International</u></p> <ul style="list-style-type: none"><li>● <a href="#">Global Forest Watch</a></li><li>● <a href="#">HCV Resource Network</a></li><li>● <a href="#">HCV Resource Network Common Guidance for the Identification of High Conservation Values.</a></li><li>● <a href="#">Intact Forest Landscapes, map</a></li><li>● <a href="#">IUCN Globally Threatened Ecosystems</a></li><li>● <a href="#">Nature Serve Canada</a></li><li>● <a href="#">NatureServe Conservation Status categories</a></li><li>● <a href="#">Shape of Nature Globally threatened ecosystems</a></li></ul> <p><u>Federal</u></p> <ul style="list-style-type: none"><li>● <a href="#">2020 Wild Species Report</a></li><li>● <a href="#">Canada National Parks Act</a></li><li>● <a href="#">Environment and Climate Change Canada</a></li><li>● <a href="#">Fisheries Act</a></li><li>● <a href="#">Migratory Birds Convention Act</a></li><li>● <a href="#">Species at Risk Act</a></li><li>● <a href="#">Species at Risk Public Registry</a></li></ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"><li>● <a href="#">ABMI - Status of Human Footprint in Alberta</a></li><li>● <a href="#">ABMI Wetland Inventory</a></li><li>● <a href="#">ABMIGC ABMI Wetland Inventory</a></li><li>● <a href="#">Alberta Conservation Information Management System - Ecological Community Tracking List</a></li><li>● <a href="#">Alberta Ecological Classification System</a></li><li>● <a href="#">Alberta field guides to ecosites</a></li><li>● <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li><li>● <a href="#">Alberta Grizzly Bear Recovery Strategy (2020)</a></li><li>● <a href="#">Alberta Land Stewardship Act</a></li><li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li><li>● <a href="#">Alberta Woodland Caribou Recovery Plan 2004/05 - 2013/14</a></li><li>● <a href="#">fRI Research</a></li><li>● <a href="#">Land-use Secretariat Landuse Regional Plans</a></li><li>● <a href="#">Provincial Parks Act</a></li><li>● <a href="#">Species at Risk Assessed in Alberta</a></li><li>● <a href="#">Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangeland Act</a></li></ul> |
|--------------------------|--|

## Annex 1 Detailed findings for Supply Base Evaluation

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|--------------------|---|
|                    | <ul style="list-style-type: none"> <li>• <a href="#">Wildlife Act</a></li> <li>• <a href="#">Willmore Wilderness Park Act</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Ducks Unlimited Forest Management Wetland Stewardship Initiative</a></li> </ul>   |
| <i>Risk rating</i> | Provincial <b>Low Risk</b>  |
| <b>2.1.2</b>       | <b>Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.</b>  |
| <i>Findings</i>    | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>See Indicator 2.1.1 Key Eco/HCV Identified context for the description of Criterion 2.1 and the two scales of biodiversity values. Indicator 2.1.1 Key Eco/HCV Identified—assesses whether the biodiversity values are identified. Indicator 2.1.1 is assessed at the provincial level.<br/>The scope of Indicator 2.1.2 Key Eco/HCV Threats ID &amp; Eval—assesses whether, once identified, appropriate actions are being taken to identify and evaluate threats/impacts that may compromise biodiversity values. Indicator 2.1.2 is assessed at the provincial level.<br/>Indicator 2.1.3 – Key Eco/HCV Maintained or Enhanced—assesses whether identified threats/impacts are mitigated, and biodiversity values are maintained or enhanced. Indicator 2.1.3 is assessed at the sub-scope level: Crown land and private land.<br/>Resource-based activities can have a negative impact on functioning ecosystems, species and genetic diversity, and habitat protection. Harvesting disturbance, the direct and indirect effects associated with access, and the loss, fragmentation or degradation of ecosystems and/or habitats can influence the abundance and distribution of biodiversity values.</p> <p><u>Landscape-level Biodiversity Values (Coarse Scale)</u><br/><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Species at Risk Act (SARA)</li> <li>• Migratory Birds Convention Act</li> <li>• Fisheries Act</li> <li>• Canada National Parks Act</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• Alberta Land Stewardship Act (ALSA)</li> <li>• Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act</li> <li>• Provincial Parks Act</li> </ul> <p><u>Stand-level Biodiversity Values (Medium/Fine Scale)</u><br/><u>Federal</u></p> |

## Annex 1 Detailed findings for Supply Base Evaluation

- Species at Risk Act (SARA)
- Migratory Birds Convention Act
- Fisheries Act

### Provincial

- Alberta Land Stewardship Act (ALSA)
- Forests Act
- Wildlife Act
- Wildlife Act Regulation
- Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act
- Provincial Parks Act

### **Enforcement and monitoring**

#### Landscape-level Biodiversity Values (Coarse Scale)

At the federal level, the Species at Risk Act (SARA) enables the federal government to identify threats to and impacts on species at risk (SAR) persistence and develop recovery/conservation plans to mitigate threats to species habitat and associated ecosystems.

The federal SARA is jointly implemented through:

- Environment and Climate Change Canada (ECCC) for overall coordination of SARA as well as Migratory Birds Convention Act (MBCA) for migratory bird SAR;
- Fisheries and Oceans Canada (DFO) for aquatic SAR;
- Parks Canada for SAR in national parks and historic sites.

The Committee of the Status of Endangered Wildlife in Canada (COSEWIC), under ECCC, identifies threats and impact evaluations for federal SAR Registry. The processes include threat evaluations for populations and habitats including forest management threats. The MBCA provides legislation that enables assessment and protection of threats to and impacts on the persistence of migratory birds and the bird habitats. The MBCA includes a Schedule 1 list of key species which overlaps with the SAR list.

Environment and Climate Change Canada (ECCC) and the Alberta Ministry of Environment and Protected Areas (MEPA) collaborate under an agreed framework, National Accord for the Protection of Species at Risk (1996), to ensure a coordinated and focused approach to the delivery of species at risk recovery in the province. This framework supports the development and implementation of recovery plans, strategies, and management plans to maintain and enhance federal and provincial listed species and ecosystems. Recovery planning includes threat assessment and identification of critical habitat.

At the provincial level, threat and impact evaluation for wide ranging species at risk is through MEPA and the Alberta Endangered Species Conservation Committee (ESCC) endangered species listing assessment process. The process includes threat evaluations for populations and habitats including forest management threats. The Alberta Biodiversity Monitoring Institute (ABMI) measures and tracks a biodiversity intactness index for species and species groups. ABMI's species data is included in the Alberta Endangered Species Conservation Committee (ESCC) SAR threat assessment. National parks, provincial parks and protected areas in Alberta are selected to conserve large landscapes. This process evaluates landscapes for concentrations of unique ecological features and rare/charismatic ecosystems that may be threatened by urban and resource development.

MEPA uses a Land Use Planning framework and develops regional land use plans for seven land use regions. Human footprint threats are assessed to assist conservation planning applicable for the regions.

## Annex 1 Detailed findings for Supply Base Evaluation

Global Forest Watch provides evaluation of change detection over time and an assessment of fragmentation threats of Intact Forest Landscapes.

### Stand-level Biodiversity Values (Medium/Fine Scale)

Much of the federal and provincial legislation and implementation mechanisms described in landscape-level biodiversity values above are applicable for the evaluation of threats and impacts of stand-level biodiversity values.

At the provincial level, MEPA and ESCC conduct threat evaluations for species at risk with small home ranges.

Species identified as endangered or threatened in Schedule 6 of the Wildlife Regulation of the Wildlife Act, are required to have the threats assessed and a recovery plan produced.

MEPA assesses threats to RTE ecosystems as part of the Alberta Conservation Information Management System (ACIMS) listing process for global and provincial and threatened ecosystems.

ABMI uses the Human Footprint Analysis with species occurrence data to also reports Biodiversity Intactness Index for the province on regions and species of interest. This analysis is an assessment of the threat of land use, resource and access management on biodiversity at the stand and landscape level.

Threats to key habitat attributes and old forests have been evaluated by MFP. Planning requirements to mitigate the threats are provided in the Alberta Forest Management Planning Standard (AFMPS), specifically Annex 4: Performance Standards. Operational requirements to mitigate the threats are provided in the Alberta Timber Harvest Planning and Operating Ground Rules (OGRs), specifically Section 2.6 (Stand structure) and Section 2.8 (Species of management concern). Much of the listed federal and provincial oversight is applicable for both landscape-level and stand-level biodiversity values.

At the federal level, COSEWIC oversees SARA species, critical habitats and updates SARA listings annually. DFO oversees the Fisheries Act, ECCC oversees the MBCA, and Parks Canada oversees the Canada National Parks Act.

At the provincial level, the Land-use Secretariat has oversight of the development and coordination of regional land use planning including new conservation areas.

At the provincial level, ESCC, under MEPA oversees the species at risk including the Federal SARA, Alberta Wildlife Act. MEPA and ACIMS oversees RTE ecosystems.

MEPA oversees conservation and protected areas under the Wilderness Areas, Ecological Reserves, Natural Area, and Heritage Rangelands Act. MFP oversees provincial parks under the Provincial Parks Act. MFP under the Forests Act oversees planning and practices related to biodiversity values. ABMI oversees Biodiversity Intactness Index, wetland inventory, and species occurrence mapping, whereas fRI Research oversees the Healthy Landscape Program.

Global Forest Watch is responsible for oversight on the evaluation of threats and impacts to Intact Forest Landscapes. Threats to and impact on biodiversity values include the loss, fragmentation or degradation of ecosystems and/or habitats.

### Landscape-level Biodiversity Values (Coarse Scale)

ECCC SAR Registry provide listed species descriptions that include threat evaluations along with species distribution, biology, population size, and protection requirements for species at risk. COSEWIC produces species assessments with evaluations of threats to persistence for consideration in SAR ranking decisions.

ECCC MBCA Schedule 1 identifies migratory birds with threats to species persistence. The threats for listed birds, eggs, and nests and avoidance are detailed in the MBCA. The Canadian Wildlife Service, a branch of ECCC, provides guidelines, best management practices, and enforcement to address identified threats to nesting birds and eggs.

At the provincial level, ESCC provides both provincially and federally listed species at risk. The Fish and Wildlife Stewardship Branch Recovery teams completes threat evaluations in the development of draft recovery plans including the identification of critical habitat for these listed species. Draft plans are submitted to ESCC for approval. Recovery plans with critical habitat identification have not been completed for all species. There are two federally listed wide-ranging species at risk with threat assessments included in recovery plans: woodland caribou and grizzly bear.

## Annex 1 Detailed findings for Supply Base Evaluation

National parks, provincial parks and protected areas in AB are selected to conserve large landscapes that include unique ecosystems that may be threatened by urban and resource development.

At the provincial level, under the Land Use Planning Framework, there are currently seven land use planning regions with two approved land use area plans. Both approved land use plans have assessed threats and have new protected conservation areas proposed and mapped.

ABMI evaluated six natural regions for human footprint as a component of assessing biodiversity intactness. The three most forested areas had 34% (Foothills), 20% (Boreal) and 6% (Rocky Mountain) human footprint respectively. These threats to biodiversity intactness are landscape fragmentation primarily from resource development including forest harvesting, as well as natural disturbances such as mountain pine beetle and wildfires. Global Forest Watch's current report (2022) identifies 5.2 million ha of Intact Forest Landscapes in Alberta, in both the timber harvesting and non-timber harvesting landbase. Threats to intactness includes fragmentation as a result of forest harvesting and associated access infrastructure.

### Stand-level Biodiversity Values (Medium/Fine Scale)

Some of the above discussed results in landscape-level biodiversity values are applicable to stand-level biodiversity values threats evaluation.

For species at risk with small home ranges The Species at Risk Assessed in Alberta (2023) report identifies species requiring threat assessments. There is a rationale for each species listed based on trend changes in populations from previous years and, where possible, commentary on possible threats. The Status of Provincial Recovery Plans report (2023) tracks recovery plan progress annually and shows species with approved plans or plans under review.

ABMI measures and tracks a biodiversity intactness index for species, species groups and associated ecosystems. ABMI uses species occurrence and human footprint data to provide four sets of provincial maps for each of six species groups; birds, mammals, vascular plants, bryophytes, lichens, soil mites and all species. The four map types are species intactness, species richness, species uniqueness, and predicted species relative abundance.

These maps portray current condition relative to no human footprint the resultant threat evaluation is the impact of agriculture, forestry, urban development and roads on forests at the stand level.

ACIMS lists globally and provincially threatened ecosystems (RTE ecosystems) in Alberta but does not itemise persistence threats or extent of impacts. Threats to key habitat attributes and old forests evaluated by MFP are incorporated into the planning requirements in the Alberta Forest Management Planning Standard (AFMPS), specifically Annex 4: Performance Standards. Operational requirements to mitigate the threats are provided in the Alberta Timber Harvest Planning and Operating Ground Rules (OGRs), specifically Section 2.6 (Stand structure) and Section 2.8 (Species of management concern).

### **Risk conclusion and justification**

There is a comprehensive federal and provincial regulatory framework with appropriate protocols and experts to identify and evaluate threats to and impacts on landscape-level and stand-level biodiversity values. Government agencies, both at the federal and provincial level, are responsible for the process of threats/impact evaluation and subsequent reporting for identified biodiversity values. Government agencies provide oversight for the threats/impact evaluation process, as well as appropriate monitoring and/or adaptive management to adjust threats/impact evaluations or resulting mitigation measures. Government websites and resources include listing, reports, analysis, recovery plans and spatial information (subject to confidentiality) demonstrating that landscape-level and stand-level biodiversity values such as key species, habitats, ecosystems, and areas of high conservation value have been evaluated or are in the process of being evaluated for threats to and impacts on identified biodiversity values. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

### *Means of verification*

- SAR Public Registry – SARA listed species, critical habitat & recovery plans
- Endangered Species Status reports
- National and Provincial Parks boundary maps
- Protected areas boundary maps and protection measures
- Regional Land Use Plan
- Global Forest Watch Intact Forest Landscape statistics and mapping
- Alberta Fish and Wildlife Internet Mapping Tool key wildlife observation locations and reports
- ABMI mapping of species occurrences
- ABMI Biodiversity Intactness Index – reports and maps
- ACIMS threatened ecosystems list
- Alberta Vegetation Inventory (AVI) and Ecological classification mapping
- Provincial Geospatial Centre – GIS data, shapefiles and/or maps (static and interactive)

## Annex 1 Detailed findings for Supply Base Evaluation

|                                 |   |
|---------------------------------|---|
| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Global Forest Watch</a></li> <li>• <a href="#">HCV Resource Network</a></li> <li>• <a href="#">HCV Resource Network Common Guidance for the Identification of High Conservation Values.</a></li> <li>• <a href="#">Intact Forest Landscapes, map</a></li> <li>• <a href="#">IUCN Globally Threatened Ecosystems</a></li> <li>• <a href="#">Nature Serve Canada</a></li> <li>• <a href="#">NatureServe Conservation Status categories</a></li> <li>• <a href="#">Shape of Nature Globally threatened ecosystems</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">2020 Wild Species Report</a></li> <li>• <a href="#">Canada National Parks Act</a></li> <li>• <a href="#">Environment and Climate Change Canada</a></li> <li>• <a href="#">Fisheries Act</a></li> <li>• <a href="#">Migratory Birds Convention Act</a></li> <li>• <a href="#">Species at Risk Act</a></li> <li>• <a href="#">Species at Risk Public Registry</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">ABMI - Status of Human Footprint in Alberta</a></li> <li>• <a href="#">ABMI Wetland Inventory</a></li> <li>• <a href="#">ABMIGC ABMI Wetland Inventory</a></li> <li>• <a href="#">Alberta Conservation Information Management System - Ecological Community Tracking List</a></li> <li>• <a href="#">Alberta Ecological Classification System</a></li> <li>• <a href="#">Alberta field guides to ecosites</a></li> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>• <a href="#">Alberta Grizzly Bear Recovery Strategy (2020)</a></li> <li>• <a href="#">Alberta Land Stewardship Act</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Alberta Woodland Caribou Recovery Plan 2004/05 - 2013/14</a></li> <li>• <a href="#">fRI Research</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p><b>Low risk</b>      Specified risk</p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

|                        |   |
|------------------------|---|
| <p><b>2.1.3</b></p>    | <p><b>Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.</b></p>  |
| <p><i>Findings</i></p> | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>See Indicator 2.1.1 context for the description of Criterion 2.1 and the two scales of biodiversity values.<br/>Indicator 2.1.1 Key Eco/HCV Identified—assesses whether the biodiversity values are identified/present. Indicator 2.1.1 is assessed at the provincial level and is required to implement Indicator 2.1.2 and 2.1.3. Indicator 2.1.2 Key Eco/HCV Threats ID &amp; Eval—assesses whether, once identified, appropriate actions are being taken to identify and evaluate threats/impacts that may compromise biodiversity values. Indicator 2.1.2 is assessed at the provincial level and is required to implement Indicator 2.1.3. The scope of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced— assesses whether identified threats/impacts are mitigated, and biodiversity values are maintained or enhanced. Applying the results of Indicator 2.1.1 and 2.1.2, this Indicator is assessed at the operational (i.e. sub-scope) level: Crown land and private land.<br/>Resource-based activities can have a negative impact on functioning ecosystems, species and genetic diversity, and habitat protection. Harvesting disturbance, the direct and indirect effects associated with access, and the loss, fragmentation or degradation of ecosystems and/or habitats can influence the abundance and distribution of biodiversity values.</p> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Species at Risk Act (SARA)</li> <li>• Migratory Birds Convention Act</li> <li>• Fisheries Act</li> <li>• Canada National Parks Act</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• Alberta Land Stewardship Act (ALSA)</li> <li>• Forests Act</li> <li>• Wildlife Act</li> <li>• Wildlife Act Regulation</li> <li>• Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act</li> <li>• Provincial Parks Act</li> </ul> <p><b>Enforcement and monitoring</b><br/><u>Provincial</u><br/>Protection of <u>large landscapes</u> at the provincial level by the Government of Alberta allow for the maintenance and enhancement of both landscape-level and stand-level biodiversity values within those protected areas. Protected areas, that include large landscapes, are spatially defined and excluded from crown land and private land management units.</p> |

## Annex 1 Detailed findings for Supply Base Evaluation

In Alberta, Intact Forest Landscapes are not legislated or recognised beyond other legislation that provides for the conservation of areas of intactness, parks and protected areas. As of March 2024, there is no publicly available information describing implementation mechanisms for restricting harvesting Intact Forest Landscapes on Crown land and private land.

### Crown Land

On Crown land, the Alberta Ministry of Forestry and Parks (MFP) has authority to administer the Forests Act, which provides the regulatory framework for the development, utilisation, protection and management of the resources of Crown lands. The Ministry of Environment and Protected Areas (MEPA) has the authority to administer the Wildlife Act, which provides for wildlife protection mechanisms associated with conserving biological diversity on Crown land. The Forests Act requires a Forest Management Agreement (FMA) to have an approved Forest Management Plan (FMP) and an Annual Operating Plan (AOP). The Alberta Forest Management Planning Standard guides the development and requirements for an FMP. The Standard defines conservation of biodiversity as one of the five priorities values to be protected has established minimum mandatory performance standards for how biodiversity values are addressed. Annex 4 of the Standard provides the framework for linking biodiversity values to clear objectives and measurable indicators and targets (VOITs). Indicators, targets, and methods outlined in Annex 4 represent pragmatic approaches to conserving forest biodiversity. Landscape-level VOITs include managing cover types and seral stages, including old forests; patch size (avoiding landscape level fragmentation); and minimizing access. Stand-level VOITs include retaining residual structure (live/dead) and managing aquatic biodiversity.

In Alberta, regional land-use plans are one of the primary mechanisms used to manage human disturbance across the landscape. Regional plans are supposed to divide a region into areas where development can occur, areas with limited human activities, and areas that are set aside for environmental protection and conservation. Regional plans are intended to plan out economic, environmental, and social objectives in a way that minimizes the cumulative impacts of human activities. The majority of Alberta's forests are located within the boreal forest natural region, covering roughly 58% of the province. The boreal region is predominantly shared across four land-use planning regions, which are the: 1) Upper Athabasca, 2) Lower Athabasca, 3) Upper Peace, and 4) Lower Peace regions. However, note that at the time of the current assessment (fall 2024), no regional plans have been developed and/or implemented for three of the four regions listed above (i.e., Upper Athabasca, Upper Peace, and Lower Peace). This means that there is no regional land use plan in place to properly plan and/or manage the cumulative impacts of human activities within those three regions.

Timber disposition holders are required to develop quantitative targets for the VOITs within FMPs. Quantitative targets for the FMPs are developed by the timber disposition holder in consultation with stakeholder and rationalized based on social acceptance, sound science, credible analysis techniques and clearly stated value trade-off. MFP approves the targets. Timber disposition holders are required to ensure operational targets are met.

The FMPs provide VOITs related to maintenance and enhancement of identified biodiversity values:

- Where wide-ranging and local range species at risk with recovery plans exist on the licenced area, critical habitat is identified and recovery plan action requirements implemented against threats;
- Where MBCA Schedule 1 species exist on the licenced area, ensure no harvest practices harm birds, habitat, or eggs and nests;
- Identify and maintain uncommon plant communities
- Use Alberta Vegetation Inventory stand attributes with spatial harvest sequencing (SHS) and stand structure retention to sustain key habitat attributes;
- Use SHS to ensure a target level of mature, old forest and old forest interior stands are maintained over a 200-year planning horizon old forest dependent species.

The Alberta Timber Harvest Planning and Operating Ground Rules (OGRs) provide legislated requirements for stand structure retention, a metric of key habitat

## Annex 1 Detailed findings for Supply Base Evaluation

attributes. The OGR stipulates that stand structure retention should provide structural complexity and include old growth attributes including snag recruitment for the short and long term. Retention minimums are 3-5% for group (island) and dispersed retention with the emphasis on group (dispersed not more than 1%). Retention targets can also include "sensitive ecological or wildlife habitat". The OGRs provide best management practices (BMPs) for stand structure retention. The OGRs also provide legislated requirements for species of management concern. Best management practices (BMPs) for Woodland Caribou, Grizzly bear, Trumpeter Swan, Barred Owl and key wildlife and biodiversity zones are identified in the OGRs.

For timber disposition holders', the means of achieving landscape-level objectives and targets is through spatial (SHS) and temporal harvest planning. The means of achieving stand-level objectives and targets is through residual structure retention strategies and OGRs.

Timber disposition holders are required to submit Stewardship Reports to MFP every five years. Stewardship Reports describe the monitoring program and how well the objectives of the FMP are being met, including VOITs. Stewardship Report results are shared with the public advisory committees for review and comments.

### Private Land

As of March 2024, there is no publicly available information describing the implementation mechanisms for managing the suite of landscape-level and stand-level biodiversity values applicable on private land.

### Federal

Committee of the Status of Endangered Wildlife in Canada oversees SARA species, critical habitats and updates SARA listings annually. DFO oversees the Fisheries Act, Environment and Climate Change Canada oversees the Migratory Birds Convention Act, and Parks Canada oversees the National Parks Act.

### Provincial

The provincial Land-use Secretariat for Alberta has oversight of the development and coordination of regional land use planning including new conservation areas. MEPA is responsible for oversight of implementation of the Wildlife Act.

### Crown Land

MPF reviews and approves timber disposition holders' FMPs, General Development Plans, Annual Operating Plans and Stewardship Reports. MFP monitors forest management activities through its Forest Operations Monitoring Program (FOMP), which is certified to the ISO 9001:2015 quality management system standard. FOMP inspections are directly linked to the OGRs, specifically for stand structure retention and species of special concern.

### Private Land

Owners of private land are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight and/or monitoring framework for landscape-level and stand-level biodiversity values on private land.

### Other

Global Forest Watch is responsible for the oversight of Intact Forest Landscapes.

### Provincial

As described in Indicator 2.1.2 – Key Eco/HCV Threats ID & Eval, species at risk lists are publicly available through the federal SAR list, the Wild Species Status website, and ACIMS. As of March 2024, recovery plans with critical habitat identification have not been completed or fully implemented. Protection of large landscapes at the provincial level by the Government of Alberta allow for the maintenance and enhancement of biodiversity values at both landscape-level and stand-level. Protected areas, that include large landscapes, are spatially defined and excluded from crown land and private land management units.

In Alberta, Global Forest Watch analysis with publicly available maps, spatially identifies Intact Forest Landscapes as threatened where Intact Forest Landscapes overlaps with forest management units. Many Intact Forest Landscapes are within protected areas in Alberta and not threatened by forest management.

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### Crown Land

In Alberta, there are two wide-ranging species at risk identified. A recovery plan for the Grizzly bear, including the identification of critical habitat, has been developed and is currently being implemented." For the Woodland Caribou recovery planning only 2 of the 11 sub-regional plans had been completed at the time of the current assessment (fall 2024) and not all herds and critical habitat zones have been fully described. . The ACIMS list global and provincial RTE ecosystems. Alberta's ecological classification system provides identification of forest ecosystems. The Standard requires FMPs to identify ecological community rarity in its performance standards. Targets are set by the licensee and approved by MFP; there are no specified government targets MFP FOMP inspects stand structure retention requirements, a metric of key habitat attributes. FOMP data indicated that for the 2023-24 timber year, there were no compliance issues related to stand structure retention. The FOMP data does not provide further detail related to specific key habitat attributes.

MFP defines old forests as stands 40 years older than mean annual increment culmination age. Old forests can be identified using the MFP Alberta Vegetation Inventory (AVI) with age class and stand structure.

Old forests are to be sustained over the 200-year planning horizon of an FMP with spatial harvest sequencing maintaining a specified percentage of old and mature and old age classes at any point in time. In addition, a percentage of interior forest interior set and enforces over the planning horizon.

### Private Land

As of March 2024, there are no publicly available results to verify the current condition of the maintenance of landscape-level and stand-level biodiversity values on private land.

### **Risk conclusion and justification**

#### Provincial

Biodiversity is a complex issue; it contains elements both at the landscape- level and stand-level, and sufficiency of maintenance or enhancement is difficult to evaluate within a risk assessment process. Indicator 2.1.3 is focused on how effectively threats to key species, habitats, ecosystems and areas of high conservation value are mitigated to maintain or enhance biodiversity values. In most cases, mitigation results from some level of protection or permanence of sustenance.

The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive. Legislative requirements, controls and guidance are in place to provide protection and/or allow the implementation of practices that maintain or enhance both landscape-level and stand-level biodiversity values. It should be noted that this risk assessment does not evaluate the sufficiency of the regulatory framework but evaluates its implementation for the elements of biodiversity values that are in place (See Indicator 2.1.1 Context section for details.)

#### Crown Land

The Crown licensees' FMP, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. In evaluating implementation mechanisms there are sections where FMP guidance is to "retain" or "maintain" or "recruit" specific elements without specific targets set in legislation or strategic level guidance. Without legislative direction or government guidance (i.e., target area, percent target or minimum requirements), there is uncertainty about the sufficiency/uniformity of implementation vis-a-vis maintenance and enhancement of biodiversity values across diverse Crown Land timber disposition holders.

Government programs provide oversight and monitor regulatory planning and practices for biodiversity values. There is no indication of widespread or systemic legal non-compliance. However, government oversight is focused on legal compliance with legislation for biodiversity values but not on sufficiency relative to the maintenance and enhancement of biodiversity values. This reinforces uncertainty with respect to sufficiency/uniformity of implementation across diverse Crown Land timber disposition holders.

## Annex 1 Detailed findings for Supply Base Evaluation

The Alberta government and other organisations have, and continue to, assess the maintenance and enhancement of landscape-level and stand-level biodiversity values. There are many assessments and reports covering different spatial and temporal scales. The results of this data, assessments, and reports are wide and varied, making it difficult to provide a definitive conclusion. Based on the extensive results, this risk assessment is unable to draw a sufficiency conclusion on the maintenance or enhancement of specific biodiversity values.

This risk assessment does identify areas of uncertainty. In the evaluation of Crown land, the most evident areas of uncertainty for the maintenance of biodiversity values are related the following:

- Woodland Caribou habitat due to the incomplete recovery plan development and/or implementation (only 2 of the 11 sub-regional plans had been completed);
- SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion;
- Intact Forest Landscapes due to lack of provincial recognition and implementation mechanism;
- RTE ecosystems due to no minimum protection targets; and
- Old forests do not have government minimum targets and are not spatially permanent.
  - Incomplete regional land use plans

Based on evidence reviewed and applying the precautionary approach, this Indicator is designated as specified risk for Crown land in Alberta.

### Private Land

There is an extensive federal and provincial regulatory framework governing biodiversity values. On private land, due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of the maintenance of landscape-level and stand-level biodiversity values, and a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.

| Biodiversity Values – Maintained / Enhanced |   | Crown Land     | Other Private Land |
|---|---|----------------|--------------------|
| Landscape Level                             | SAR – wide-ranging / regionally significant | Specified risk | Specified risk     |
|   | Large landscapes                            | Low risk       | Low risk           |
|   | Intact Forest Landscapes                    | Specified risk | Specified risk     |
| Stand Level                                 | SAR – local / endemic                       | Specified risk | Specified risk     |
|   | RTE Ecosystems                              | Specified risk | Specified risk     |
|   | Woodland Caribou habitat & Old Forests      | Specified risk | Specified risk     |

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### *Means of verification*

- Provincial Caribou recovery planning and [Alberta Caribou Ranges Map](#)
- SAR Public Registry – SARA listed species, critical habitat & recovery plans
- Endangered Species Status reports
- National and Provincial Parks boundary maps
- Protected areas boundary maps and protection measures
- Regional Land Use Plans
- Global Forest Watch Intact Forest Landscape statistics and mapping
- Alberta Fish and Wildlife Internet Mapping Tool key wildlife observation locations and reports
- ABMI mapping of species occurrences
- ABMI Biodiversity Intactness Index – reports and maps
- ACIMS threatened ecosystems list
- Alberta Vegetation Inventory (AVI) and Ecological classification mapping
- Provincial Geospatial Centre – GIS data, shapefiles and/or maps (static and interactive)

## Annex 1 Detailed findings for Supply Base Evaluation

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| <i>Evidence reviewed</i> | <p><u>International</u></p> <ul style="list-style-type: none"><li>• <a href="#">Global Forest Watch</a></li><li>• <a href="#">HCV Resource Network</a></li><li>• <a href="#">HCV Resource Network Common Guidance for the Identification of High Conservation Values</a></li><li>• <a href="#">Intact Forest Landscapes, map</a></li><li>• <a href="#">IUCN Globally Threatened Ecosystems</a></li><li>• <a href="#">Nature Serve Canada</a></li><li>• <a href="#">NatureServe Conservation Status categories</a></li><li>• <a href="#">Shape of Nature Globally threatened ecosystems</a></li></ul> <p><u>Federal</u></p> <ul style="list-style-type: none"><li>• <a href="#">2020 Wild Species Report</a></li><li>• <a href="#">Canada National Parks Act</a></li><li>• <a href="#">Environment and Climate Change Canada</a></li><li>• <a href="#">Fisheries Act</a></li><li>• <a href="#">Migratory Birds Convention Act</a></li><li>• <a href="#">Species at Risk Act</a></li><li>• <a href="#">Species at Risk Public Registry</a></li></ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"><li>• <a href="#">Alberta Caribou Ranges Map</a></li><li>• <a href="#">ABMI - Status of Human Footprint in Alberta</a></li><li>• <a href="#">ABMI Wetland Inventory</a></li><li>• <a href="#">ABMIGC ABMI Wetland Inventory</a></li><li>• <a href="#">Alberta Conservation Information Management System - Ecological Community Tracking List</a></li><li>• <a href="#">Alberta Ecological Classification System</a></li><li>• <a href="#">Alberta field guides to ecosites</a></li><li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li><li>• <a href="#">Alberta Grizzly Bear Recovery Strategy (2020)</a></li><li>• <a href="#">Alberta Land Stewardship Act</a></li><li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li><li>• <a href="#">Alberta Woodland Caribou Recovery Plan 2004/05 - 2013/14</a></li><li>• <a href="#">fRI Research</a></li><li>• <a href="#">Land-use Secretariat Landuse Regional Plans</a></li><li>• <a href="#">Provincial Parks Act</a></li><li>• <a href="#">Species at Risk Assessed in Alberta</a></li></ul> |
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## Annex 1 Detailed findings for Supply Base Evaluation

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|                    | <ul style="list-style-type: none"> <li>• <a href="#">Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangeland Act</a></li> <li>• <a href="#">Wildlife Act</a></li> <li>• <a href="#">Willmore Wilderness Park Act</a></li> <li>• <a href="#">Alberta Environment and Protected Areas. Status of Provincial Recovery Plans. April 2023.</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Ducks Unlimited Forest Management Wetland Stewardship Initiative</a></li> </ul> |
| <i>Risk rating</i> | <p>Crown Land <b>Specified risk</b></p> <p>Private Land <b>Specified risk</b></p>   |

### Criterion 2.2 – Ecosystem productivity, functions, and services are maintained or enhanced

|                 |   |
|-----------------|---|
| <b>2.2.1</b>    | <b>Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests; b. Wetlands; c. Peatlands; d. Highly biodiverse grasslands</b>   |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>The Sustainable Biomass Program (SBP) glossary defines:</p> <ul style="list-style-type: none"> <li>• Conversion as “the process of changing or causing something to change from one form to another form.”</li> <li>• Deforestation as “the conversion of forest to another land use or the long-term reduction of tree canopy cover below the 10% threshold.”</li> <li>• Afforestation as “the conversion from other land uses into forest, or the increase of the canopy cover to above the 10% threshold.”</li> </ul> <p>The focus of evaluation for this Indicator is on land classified as forest.</p> <p>The SBP glossary defines forest as “land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10 percent, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or urban land use.”</p> <p>Deforestation encompasses permanent conversion of forest to non-forest as a result of any anthropogenic-caused change in land use. Therefore, timber harvesting followed by re-establishment of forest tree cover is not deforestation.</p> <p>In Canada, the industrial groups contributing to deforestation include agriculture, built- up, forestry roads, hydro &amp; hydro lines, mines, oil &amp; gas, and transportation. The forestry industrial group has forest management type tenures. The other industry sectors (i.e., agriculture, built-up, hydro &amp; hydro lines, mines, oil &amp; gas, and transportation), do not have forest management tenures.</p> <p>Wetlands, peatlands, and grasslands ecosystems are not included in the evaluation of this Indicator because:</p> <ul style="list-style-type: none"> <li>• Wetlands, peatlands, and grasslands within forested ecosystems are excluded from the timber harvesting land base and subsequently not harvested.</li> <li>• Afforestation of wetlands, peatlands, and grasslands does not occur.</li> <li>• Wetlands, peatlands, and grasslands ecosystems are unique habitats that have been identified as having relatively high carbon stocks. The carbon and climate</li> </ul> |

## Annex 1 Detailed findings for Supply Base Evaluation

impacts of land use change are described in the Indicators in Principle 3 – Feedstock is Only Sourced From Supply Basis Where the Forest Carbon Stock is Stable or Increasing Long Term. Details on the management of wetlands and peatlands ecosystems are provided in Indicator 2.2.5 – Water Quality/Quantify Maintained or Enhanced.

Negative impacts of conversion include deforestation, fragmentation, altered or degraded habitat and ecosystems, reduced productive forest areas, and increased carbon emissions.

### Crown Land

- Forest Act
- Timber Management Regulation

### Private Land

There is no regulatory framework to prevent the conversion of forests on private land.

## **Enforcement and monitoring**

### Federal

The National Deforestation Monitoring System report areas affected by deforestation annually. The System was developed to fulfil Canada’s obligation under the United Nations Framework Convention on Climate Change. The System monitors deforestation activities using a sample of spatial cells to estimate areas of deforestation and then scale to national level. Satellite-based monitoring systems distinguish deforestation from other types of temporary forest cover loss (i.e., forest harvest, wildfires, insect damage). Deforestation estimates are attributed to specific industrial groups including agriculture, built-up, forestry roads, hydro & hydro lines, mines, oil & gas, and transportation. Deforestation in the forestry roads industrial group category is specific to new permanent forestry roads and any other large permanent clearings.

### Crown Land

The Timber Management Regulation, under the Forests Act, administered by the Alberta Ministry of Forestry and Parks (MFP) requires all timber disposition holders with forest management tenures to reforest following harvesting. Reforestation requirements are outlined in the Reforestation Standard of Alberta and implemented through Alberta Forest Management Planning Standard Stewardship Reporting requirements, and the Reforestation Program of the Annual Operating Plan (AOP). A Reforestation Program is a component of AOP each year. The AOP links reforestation operations to the Forest Management Plan (FMP). Under the Forest Act, timber disposition holders are allowed to convert forest to non- forest during the construction of permanent roads, landings, and infrastructure required for operations. The Timber Management Regulation details requirements. FMPs and AOPs detail timber disposition holders’ practices.

On Crown land for the industry sectors that do not have forest management type tenures (i.e., agriculture, built-up, hydro & hydro lines, mines, oil & gas, and transportation), there is applicable legislation that does not restrict conversion. There are multiple government departments responsible for reviewing and approving projects, and variable permit-specific revegetation obligations.

Land-use altering permits are for agriculture, built-up, hydro & hydro lines, mines, oil & gas, and transportation industry sectors. Once the land-use altering permits have expired, reclamation, remediation, or restoration requirements may be a condition of the permitted area to be released from the permit holder.

As of March 2024, there is no publicly available information describing implementation mechanisms that prevents the conversion of forests for sectors operating on Crown land that do not have forest management type tenures.

### Private Land

As of March 2024, there is no publicly available information describing implementation mechanisms that prevents the conversion of forests on private land.

## Annex 1 Detailed findings for Supply Base Evaluation

Conversion is implemented at the landowner's discretion.

### Federal

Deforestation is monitored by the federal government as part of Canada's national reporting on greenhouse gas (GHG) emissions. Natural Resources Canada is responsible for monitoring and reporting deforestation.

Since 1990, the National Deforestation Monitoring System tracks deforestation area by industrial sector across Canada annually.

### Crown Land

MFP is responsible for the oversight of reforestation of timber disposition holders through review and approval of AOPs, which includes the Reforestation Program. MFP monitors reforestation through its Forest Operations Monitoring Program (FOMP).

As of March 2024, there is no publicly available information describing an oversight framework that prevents the conversion of forests on Crown land utilised by non-forest management industry sectors.

### Private Land

As of March 2024, there is no publicly available information describing an oversight framework that prevents the conversion of forests on private land. Owners are responsible for the oversight of operations.

### Federal

The Government of Canada reports deforestation in the State of Canada's Forests Annual Reports, deforestation statistics to the United Nations Food and Agriculture Organization's Global Forest Resources Assessments, and provides annual estimates of GHG emissions from deforestation in Canada's National Inventory Report: Greenhouse Gas Sources and Sinks in Canada. The State of Canada's Forest Annual Report 2023, states Canada has contributed 0.37% of the total global deforestation that has occurred since 1990. Canada has 9% of global forests. The annual rate of deforestation in Canada is 0.01% of its forest area. Deforestation was responsible for approximately 2% of Canada's national annual carbon dioxide emissions in 2020.

The Annual Report 2023 reports in 2021, 50,518 ha were attributed to deforestation in Canada. Agriculture made up 22,378 ha (44.2%), mining and oil & gas 15,147 ha (30.0%), built-up 9,629 ha (19.1%), hydroelectric 2,273 ha (4.5%), and forestry (specific to new permanent forestry access roads and any other large permanent clearings) 1,092 ha (2.2%). Forest-area change numbers were not broken down by province.

### Crown Land

Timber disposition holders have reforestation obligations. Results are verified by MFP and tracked in FOMP (see results from 0 – Regen After Harvest). Timber disposition holders track forest land converted as a result of the construction of permanent roads, landings, and infrastructure.

As of March 2024, there are no publicly available results to verify the current condition of deforestation specific to non-forest management industry sectors.

### Private Land

As of March 2024, there are no publicly available results to verify the current condition of deforestation on private land.

### **Risk conclusion and justification**

Data shows Canada's annual rate of deforestation is low and Canada has contributed a fraction of a per cent to global deforestation since 1990. National data also shows that non-forest industry sectors (i.e., agriculture, built-up, hydro & hydro lines, mines, oil & gas, and transportation) are the economic drivers of deforestation and ultimately land conversion. Although the deforestation rate is low, this Indicator is to evaluate the risk of land conversion, not the rate.

### Crown Land

## Annex 1 Detailed findings for Supply Base Evaluation

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|                                     | <p>On Crown land for licensees with forest management tenures, there is a comprehensive regulatory framework governing reforestation requirements and limited conversion to non-forest use. FOMP data verified timber disposition holders comply with reforestation requirements. On Crown land for the industry sectors that do not have forest management type tenures, legislation does not restrict land conversion. Due to a lack of evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land in Alberta.</p> <p><u>Private Land</u></p> <p>Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework, and/or results of current condition of deforestation, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Deforestation/conversion assessments, applicable to the supply base area</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with suppliers</li> </ul>  |
| <p><i>Evidence reviewed</i></p>     | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Canada's National Deforestation Monitoring System: System Description 2015</a></li> <li>● <a href="#">National Deforestation Monitoring System</a></li> <li>● <a href="#">The State of Canada's Forests Annual Report (2023)</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Alberta Forest Management Planning Standard Bulletin: Stewardship Reporting Requirements</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Forests Act</a></li> <li>● <a href="#">Timber Management Regulation</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Sustainable Biomass Program Standards Glossary Version 2.0</a></li> </ul>   |

## Annex 1 Detailed findings for Supply Base Evaluation

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| <i>Risk rating</i> | Crown Land <b>Specified risk</b><br>Private Land <b>Specified risk</b>  |
| <b>2.2.2</b>       | <b>Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.</b>   |
| <i>Findings</i>    | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>The assessment of this Indicator focuses on the maintenance of healthy and vital ecosystem functions and services. To maintain health and vital, ecosystems must maintain functions and services. Functions and services have been evaluated more specifically in other Criterion 2.2 Indicators, including:</p> <ul style="list-style-type: none"> <li>• Maintaining productivity: <ul style="list-style-type: none"> <li>• Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem</li> <li>• Indicator 2.2.9 – Long-term Production Capacity</li> <li>• Indicator 2.2.10 – Regen After Harvest</li> </ul> </li> <li>• Maintaining soil productivity: <ul style="list-style-type: none"> <li>• Indicator 2.2.3 – Soil Quality Maintained or Enhanced</li> </ul> </li> <li>• Maintaining water quality and quantity: <ul style="list-style-type: none"> <li>• Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced</li> </ul> </li> <li>• Managing natural disturbances: <ul style="list-style-type: none"> <li>• Indicator 2.2.11 – Natural Processes are Managed</li> </ul> </li> </ul> <p>Management that impedes, alters, or disrupts ecological functions reduces the ability of forests to sustain healthy and vital ecological services. Consequently, ecosystems are more susceptible to degradation and irreversible losses or damage.</p> <p>See Indicators:</p> <ul style="list-style-type: none"> <li>• Indicator 2.2.3 – Soil Quality Maintained or Enhanced;</li> <li>• Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem;</li> <li>• Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced;</li> <li>• Indicator 2.2.9 – Long-term Production Capacity;</li> <li>• Indicator 2.2.10 – Regen After Harvest;</li> <li>• Indicator 2.2.11 – Natural Processes are Managed.</li> </ul> <p><b>Enforcement and monitoring</b><br/>See Indicators:</p> <ul style="list-style-type: none"> <li>• Indicator 2.2.3 – Soil Quality Maintained or Enhanced;</li> </ul> |

## Annex 1 Detailed findings for Supply Base Evaluation

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|                                     | <ul style="list-style-type: none"> <li>• Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem;</li> <li>• Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced;</li> <li>• Indicator 2.2.9 – Long-term Production Capacity;</li> <li>• Indicator 2.2.10 – Regen After Harvest;</li> <li>• Indicator 2.2.11 – Natural Processes are Managed.</li> </ul> <p><b>Risk conclusion and justification</b></p> <p>All six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem (2.2.3, 2.2.4, 2.2.5, 2.2.9, 2.2.10, 2.2.11) have low risk designations for Crown land in Alberta. As such, this Indicator also has a low risk designation for Crown land in Alberta.</p> <p>Three of the six Indicators which detail the functions and services that must be maintained to have a healthy and vital ecosystem, (2.2.3 – Soil Quality Maintained or Enhanced; 2.2.9 – Long-term Production Capacity and 2.2.10 – Regen After Harvest) have a specified risk designation for private land in Alberta. As such, this Indicator also has a specified risk designation for private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with experts</li> <li>• Interview with suppliers</li> </ul>  |
| <p><i>Evidence reviewed</i></p>     | <p>See Indicators:</p> <ul style="list-style-type: none"> <li>• Indicator 2.2.3 – Soil Quality Maintained or Enhanced;</li> <li>• Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem;</li> <li>• Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced;</li> <li>• Indicator 2.2.9 – Long-term Production Capacity;</li> <li>• Indicator 2.2.10 – Regen After Harvest;</li> <li>• Indicator 2.2.11 – Natural Processes are Managed.</li> </ul>  |

## Annex 1 Detailed findings for Supply Base Evaluation

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| <i>Risk rating</i> | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>   |
| <b>2.2.3</b>       | <b>Soil quality in the Supply Base shall be maintained or enhanced.</b>   |
| <i>Findings</i>    | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>In the context of this Indicator, soil quality is equivalent to soil productivity, which is defined as the ability of forest soil to allow forests to grow, produce crops and function with minimal human intervention. This evaluates soil quality on an individual site level. Cumulative impacts on soil quality on the landscape from harvesting and road construction are beyond the scope of this Indicator. Soil quality as it affects water quality via sedimentation is further discussed in Indicators 2.2.5 Water Quality &amp; Quality Maintenance or Enhanced and 4.2.3 Basic Needs of Community Maintained or Enhanced. Forest residue and coarse woody debris retention are discussed in Indicator 2.2.4 Residue Removal Minimises Neg Impact to Ecosystem.<br/>Potential impacts from forest management activities (i.e., harvesting and roadbuilding) can include on- and off-site negative impacts to soil productivity, hydrology, watersheds, and ecological values. Disturbances such as landslides, erosion, and sedimentation can result in public safety and/or infrastructure damage.</p> <p><u>Crown Land</u></p> <ul style="list-style-type: none"> <li>• Forests Act</li> <li>• Timber Management Regulation</li> <li>• Public Lands Act</li> </ul> <p><u>Private Land</u></p> <ul style="list-style-type: none"> <li>• Soil Conservation Act</li> <li>• Water Act</li> </ul> <p><b>Enforcement and monitoring</b></p> <p><u>Crown Land</u><br/>The Alberta Ministry of Forestry and Parks (MFP) is the responsible agency for ensuring soil quality is maintained or enhanced on Crown land via provincial legislation including the Forests Act and the Public Lands Act.<br/>In the Alberta Forest Management Planning Standard, watershed/soil is one of the five priorities the Alberta government identifies as values to be protected. These are captured in the values, objectives, indicators and targets (VOITs) identified in Forest Management Plans (FMPs). Soil productivity and protection come from the Timber Harvest Planning and Operating Ground Rules (OGR) framework, which standardises the operating ground rules for all Forest Management Agreement (FMA) holders. There are FMP-specific addendums supplemental to the operating ground rules and are negotiated with the applicable FMA holder where additional ground rules are required to address specific strategies in an FMP. The OGR covers soil displacement, compaction, and rutting associated with harvesting operations. In addition, it identifies best management practices, soil impacts from road construction, maintenance, and reclamation.</p> |

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On Crown land, timber disposition holders are responsible for including soil- related operating ground rules in Annual Operating Plans (AOPs) and monitoring annual harvest block compliance.

### Private Land

Local municipalities are responsible for preventing soil loss or deterioration on private land. The relevant legislation includes the Soil Conservation Act and the Water Act. On private land, there is no publicly available information describing implementation mechanisms, other than landowner recognition and understanding of appropriate legislation (Water Act and Soil Conservation Act) regarding forest harvest activities.

As of March 2024, there is no publicly available information describing implementation mechanisms to manage or maintain soil quality on private land.

### Crown Land

MFP monitors soil conservation through its Forest Operations Monitoring Program (FOMP), which is certified to the ISO 9001:2015 quality management system standard. FOMP inspections are directly linked to the OGR. MFP encourages self-reporting by companies and individuals. Timber disposition holders monitor soil conservation activities through inspections of soil-related operating ground rule compliance. Timber disposition holders are required to produce Stewardship Reports reported every five years. Stewardship Reports include the incidence of compaction, rutting, erosion, and adherence to VOITs.

### Private Land

On private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework to manage or maintain soil quality on private land.

### Crown Land

MFP FOMP data verified that from 2018 to 2023, there were no significant issues found related to soil quality maintenance or enhancement. Forest Act and Timber Management Regulation contraventions are publicly available, but do not distinguish soil contraventions.

### Private Land

As of March 2024, there are no publicly available results to verify the current condition of soil quality on private land.

### **Risk conclusion and justification**

#### Crown Land

There is a comprehensive regulatory framework governing soil quality for Crown land. There are well described operational guidelines for harvesting related to soil erosion, compaction, and rutting. The government monitors harvest blocks for compliance. MFP FOMP data verify compliance with practice requirements related to soil quality. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.

#### Private Land

Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of soil quality, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

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| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Soil assessments, applicable to the supply base area</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with experts</li> <li>● Interview with suppliers</li> </ul> |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Alberta Forest Management – Overview Website</a></li> <li>● <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Forests Act</a></li> <li>● <a href="#">Public Lands Act</a></li> <li>● <a href="#">Forests Act Contraventions</a></li> <li>● MFP FOMP Inspection Data 2018 – 2023</li> <li>● <a href="#">Soil Conservation Act</a></li> <li>● <a href="#">Timber Management Regulation</a></li> <li>● <a href="#">Water Act</a></li> </ul>   |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>   |
| <p><b>2.2.4</b></p>                 | <p><b>Where the removal of harvest forest residues and / or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.</b></p>   |
| <p><i>Findings</i></p>              | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p>  |

### Analysis

Forest harvest residues refers to the fibre left 'in-block' (in the forest) or roadside after primary harvesting operations have been completed. This fibre includes smaller and poor-quality logs, pieces of logs, branches, and other woody biomass. It has historically been called waste or harvest residue (See Indicator 2.2.9 – Long-term Production Capacity). In Alberta, stumps are not removed unless the site is being converted to non- forest use (See Indicator 2.2.1 – Conversion – a, b, c, d). In Alberta, trees are brought to roadside for delimiting and cut to length. Harvest residue left roadside is often burned or left to decay, resulting in greenhouse gas emissions (See **Indicator 2.2.6 – Air Emissions Comply with Laws**). Harvest residue remaining in-block contributes to woody debris that provides site nutrients and stand-level biodiversity. The Indicators within Criterion 2.2 and Criterion 2.1 discuss other ecological values that may be impacted.

Forest harvest residue removal, if not properly planned and implemented, can harm the ecosystem productivity by reducing nutrient availability and changing the site's characteristics in terms of species and habitats.

#### Crown Land

- Forests Act
- Timber Management Regulation
- Forest and Prairie Protection Act (FPPA)

#### Private Land

There is no regulatory framework regarding the removal of harvest residues and not negatively impacting the ecosystem on private land.

### Enforcement and monitoring

#### Crown Land

On Crown land, the Alberta Ministry of Forestry and Parks (MFP) has authority to administer the Forests Act and Timber Management Regulation which provides the regulatory framework regarding timber utilisation and harvest residues. On Crown land, utilisation standards are stipulated in the Forest Management Agreements (FMAs). The Alberta Forest Management Planning Standard states that FMAs outline minimum utilisation limits.

The Alberta Forest Management Planning Standard details a performance indicator of retaining downed woody debris. The indicator must be reported the percent of harvested area with retained downed woody debris. This is a mandatory values, objectives, indicators, and targets (VOIT) reporting requirement of the Stewardship Report, which is required every five years. The Alberta Timber Harvest Planning and Operating Ground Rules (OGR) state that all merchantable timber must be utilised such that sustainability is not negatively affected. OGR also outlines stand structure retention, understory protection, and stub retention practices that affect non-merchantable trees, snags and stubs, which would otherwise be considered residue or waste.

The OGR defines standard debris practices. The goal should be to maintain residual debris at pre-harvest levels of adjacent stands. The Alberta 2017 Debris Management Standards for Timber Harvest Operations guides debris management in timber harvesting operations in compliance with the Forest and Prairie Protection Act and the Forests Act. The Debris Management Standards state that timber disposition holders must consider alternative methods of waste disposal (mulching or chipping) to burning. Alternative methods of waste disposal are submitted and approved at the Annual Operating Plan (AOP) stage.

#### Private Land

On private land, there are no utilisation regulatory requirements or defined standards. Utilisation is implemented at the landowner's discretion.

#### Crown Land

On Crown land, the MFP approves timber disposition in FMPs and AOPs which define utilisation and harvest residue standards.

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MFP also monitors the implementation of the FMPs and the OGRs through the Forest Operations Monitoring Program (FOMP). FOMP inspections monitor OGRs, including utilisation standard requirements with Standard Operating Procedures.

Contraventions can be enforced by MFP.

### Private Land

On private land, landowners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework for harvest residue removal.

### Crown Land

Forests Act contraventions are publicly available. Utilisation standard contraventions are as follows:

- 2023 – 1
- 2022 – 2
- 2021 – 1
- 2020 – 0
- 2019 – 3

Results of downed woody debris requirements are reported by individual companies in Stewardship Reports.

### Private Land

On private land, utilisation is implemented at the landowner's discretion and subject to market conditions for timber merchantability and economic viability for harvest residue removal.

### **Risk conclusion and justification**

#### Crown Land

There is a comprehensive regulatory framework, compliance, and enforcement systems, including reporting to address harvest residue utilisation while minimizing negative impacts to the ecosystems. Trees are brought to roadside and/or landings to be processed and harvesting residues are then utilised or piled/burned. As such, utilisation of harvesting residues from roadside does not contribute to negative impacts to the ecosystem. Utilisation contraventions are publicly available. Crown licensees report results of downed woody debris. Controls and procedures in place, and there is no indication of systemic non-compliance. Based on evidence reviewed, this Indicator is designated at low risk for Crown land in Alberta.

#### Private Land

There is no regulatory requirements regarding the removal of harvest residues on private land. Requirements for not negatively impacting the ecosystem are addressed in Criterion 2.1 and Criterion 2.2. Trees are brought to roadside and/or landings to be processed and harvesting residues are then utilised or piled/burned. Utilisation of harvesting residues from roadside does not contribute to negative impacts to the ecosystem. There is no indication of systemic concerns relating to removal of harvesting residues. As such, this Indicator is designated at low risk for private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

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| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Waste &amp; residue assessments, applicable to the supply base area</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with experts</li> <li>● Interview with suppliers</li> </ul> |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Debris Management Standards for Timber Harvest Operations</a> (2017)</li> <li>● <a href="#">Forest and Prairie Protection Act (FPPA)</a></li> <li>● <a href="#">Forests Act</a></li> <li>● <a href="#">Forests Act Contraventions</a></li> <li>● <a href="#">Timber Management Regulation</a></li> </ul>  |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>  |
| <p><b>2.2.5</b></p>                 | <p><b>Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.</b></p>  |
| <p><i>Findings</i></p>              | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>The intent of this Indicator is to maintain or enhance water quality and quantity by managing ecosystem functions and services. Maintenance of drinking water is</p>   |

## Annex 1 Detailed findings for Supply Base Evaluation

addressed in Indicator 4.2.3 Basic Needs of Community Maintained or Enhanced. Spills and waste requirements are addressed in Indicator 2.2.8 Waste Disposal. Forest management activities may negatively affect water resources directly and indirectly by changing ecosystem functions and services. Impacts include sedimentation, disturbance of site's hydrology above and underground, modification of the site's capacity to control seasonal precipitation fluctuations (i.e., flooding), spawning habitat, hinder fish's capability to move up or downstream, water temperature, water quality (i.e., turbidity) and/or quantity, and loss of riparian habitat and function.

### Federal

- Fisheries Act
- Species at Risk Act
- Canadian Navigable Waters Act
- Canadian Environmental Protection Act

### Provincial

- Water Act
- Environmental Protection and Enhancement Act (EPEA)
- Forests Act
- Timber Management Regulation

### **Enforcement and monitoring**

#### Federal

The federal Fisheries Act, administered through Fisheries and Oceans Canada (DFO), makes it mandatory safe passage for fish is provided on all "fish bearing" watercourses. Safe fish passage is the free movement of fish in and about streams, lakes, and rivers. Unless proven otherwise, all watercourses are to be classified as "fish bearing." The federal Canadian Navigable Waters Act, administered through DFO, sets the requirements for watercourse crossings. DFO has an approval process and management requirements for projects near water ensuring there are no deleterious impacts associated with the activity while working within or near water courses or water bodies. Environment and Climate Change Canada (ECCC) is responsible for the Species at Risk Act and the Canadian Environmental Protection Act. ECCC implements water quality protection through the Federal Environmental Quality Guidelines.

Federal Acts apply to Crown land and private land.

#### Provincial

The Alberta Ministry of Environment and Protected Areas (MEPA) has authority to administer the Water Act and Environmental Protection and Enhancement Act (EPEA).

The Water Act provides the regulatory instrument for the conservation and management of water, through the use and allocation of water in Alberta. The EPEA provides the regulatory instrument for the management of air, water, land, and biodiversity in Alberta. Under the Water Act, MEPA provides water licencing and temporary diversion approvals and monitoring. Guidance for managing forest harvesting around wetlands is provided through the implementation of the Alberta Wetland Policy. The policy is administered under the Water Act and has separate approval mechanisms for temporary and permanent wetlands.

The Water Act and EPEA are applicable to Crown land and private land.

#### Crown Land

The Alberta Ministry of Forestry and Parks (MFP) has authority to administer the Forests Act, which provides the regulatory framework for aquatic and riparian area protection on Crown land. The Timber Management Regulation, under the Forests Act, stipulates that timber disposition holders must ensure that timber harvesting does not impede

## Annex 1 Detailed findings for Supply Base Evaluation

the natural flow or water in any watercourse or contaminate/pollute any watercourse on Crown land. The Forest Management Planning Standard requires Forest Management Agreement (FMA) holders include spatial harvest sequencing in Forest Management Plans (FMP) that considers watershed and riparian values as well as prediction of harvest impacts on water yield.

The Alberta Timber Harvest Planning and Operating Ground Rules (OGRs) provide legislated requirements for aquatic and riparian area protection, which manage the implications of timber operations on values of water quality, water quantity, hydrologic function, and hydrologic connectivity. Best management practices (BMPs) are identified in the OGRs. Standards and guidelines for treed buffers, protection areas, and acceptable tree falling and equipment operations are provided for each classification of watercourses. There are also restricted activity periods based on fish management zones.

The OGRs provides acceptable watercourse crossing structures based on type of watercourse and season. Deactivation of watercourse crossings are required once harvesting is completed. Timber disposition holders are required to submit an Annual Operating Plan (AOP) outlining all watercourse crossings planned for construction during harvesting operations. The Wetland Best Management Practices for Forest Management Planning and Operations Practitioner Guide published by the Forest Management Wetland Stewardship Initiative assists with operational planning and provides BMPs that can assist forest practitioners.

### Private Land

As of March 2024, there is no publicly available information describing implementation mechanisms for water quality/quantity maintenance on private land.

### Federal

DFO provides oversight of federal legislation for applicable streams and waterbodies.

### Provincial

MEPA monitors compliance to the Water Act and spill or pollutant incidents related to water courses or water bodies. MEPA conducts compliance and enforcement for water quality infractions under the Water Act for Crown land and private land in Alberta. The fRI Research Water and Fish Program conducts watershed assessments research, hydrological response to disturbance, culvert impacts on fish, and modelling forest harvest on flow regimes. fRI research has assisted in the development of provincial watershed assessments and operational harvesting guidelines.

### Crown Land

MFP monitors compliance with the OGRs through the Forest Operations Monitoring Program. MFP monitors timber operations and verify inspection information provided by timber disposition holders, as per OGRs requirements. MFP conducts compliance and enforcement for water quality infractions of the Forests Act. MFP performs audits or spot checks of harvest area status reports, including verification of all reported instances of non-compliance and determines enforcement actions appropriately.

Timber disposition holders are required to establish a monitoring program for timber operations and water crossings. Any operational activities that contravene the OGRs, forest tenure documents, legislation, or the approved AOP, must report the incident to MFP within 48 hours of discovery. Timber disposition holders are required to produce Stewardship Reports reported every five years. Stewardship Reports include reporting of watercourse crossings which are in non-compliance and forecasted impact of timber harvesting on water yields.

### Private Land

Beyond MEPA monitoring, as of March 2024, there is no publicly available information describing an oversight framework for water quality/quantity maintenance on private land. Private landowners are responsible for the oversight of operations.

### Provincial

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|                                     | <p>MEPA contraventions include both Crown land and private land penalties. In 2020/21, MEPA reported 12 enforcement orders and three management orders were issued under the Water Act. Nine administrative penalties were issued under the Water Act, resulting in \$56,000 in penalty assessments. In 2019/2020, MEPA reported 15 enforcement orders under the Water Act. One administrative penalty was issued under the Water Act, resulting in \$3,500 in penalty assessments.</p> <p><u>Crown Land</u><br/>Additionally, MFP Forest Operations Monitoring Program data verified that timber disposition holders were compliant with legislation, with a variance of 19% to 26%, for 2021/2022 and 2022/2023.</p> <p><b>Risk conclusion and justification</b></p> <p><u>Crown Land</u><br/>There is a comprehensive legislative framework governing water quality and quantity maintenance on Crown land. Planning standards ensure management plans consider watershed and riparian values as well as prediction of harvest impacts on water yield. There are operational guidelines and government programs monitor forest management practices. Compliance monitoring of water quality and quantity is completed and verifies conformance. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.</p> <p><u>Private Land</u><br/>On private land, the federal and provincial legislation related to the maintenance of water quality and quantity is comprehensive. There are no requisite planning standards to evaluate water quantity and quantity impacts from forest harvesting. Private landowners are required to adhere to protection of water quality under the Water Act and manage land around wetlands consistent with the Alberta Wetland Policy. MEPA monitors private land and results does not indicate a systemic non-compliance. Based on the evidence reviewed, this Indicator is designated as low risk for private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Watershed and/or riparian assessments, applicable to the supply base area</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with experts</li> <li>● Interview with suppliers</li> </ul>  |

## Annex 1 Detailed findings for Supply Base Evaluation

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|---------------------------------|--|
| <p><i>Evidence reviewed</i></p> | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Canadian Environmental Protection Act</a></li> <li>● <a href="#">Canadian Navigable Waters Act</a></li> <li>● <a href="#">Federal Environmental Quality Guidelines</a></li> <li>● <a href="#">Fisheries Act</a></li> <li>● <a href="#">Species at Risk Act</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>● <a href="#">Alberta Forest Management Planning Standard Bulletin: Stewardship Reporting Requirements</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Alberta Wetland Policy</a></li> <li>● <a href="#">Environmental Protection and Enhancement Act</a></li> <li>● <a href="#">Forest Management Wetland Stewardship Initiative - Wetland BMPs for Forest Management Planning and Operations - Ducks Unlimited Canada National Boreal Program</a></li> <li>● <a href="#">Forests Act</a></li> <li>● MFP FOMP Inspection Data 2018 – 2023</li> <li>● <a href="#">Ministry of Environment and Protected Areas Compliance Assurance Annual Reports</a></li> <li>● <a href="#">Timber Management Regulation</a></li> <li>● <a href="#">Water Act</a></li> <li>● <a href="#">Wetland Policy</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>  |
| <p><b>2.2.6</b></p>             | <p><b>Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.</b></p>  |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>The scope of this Indicator is specific to open burning and management of smoke due to forest management activities. It does not include emissions from industrial sources such as facilities (i.e., sawmills, including log sort yards) and/or transportation and machinery sources (federal and provincial statutes). Forest operations on Crown land are legally required to dispose of harvest residue to reduce fire hazards. This could include slash pile burning. Air quality between May and September is periodically influenced by wildfire smoke from local fires and long-range wildfire smoke from outside of the province.</p>  |

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Burning of wood and vegetation is standard industry practice for abating fire hazard, however, air emissions, particularly fine particulate matter emissions, from slash / prescribed burning can raise air quality above the Canadian Ambient Air Quality Standards at varying scales (i.e., communities, valleys, airsheds). Threats/impacts can include:

- Emission of increased levels of air pollutants such as particulate matter, carbon monoxide, nitrogen oxides, and volatile organic compounds into the environment;
- Reduced air quality and possible related health impacts;
- Public complaints related to reduced air quality.

### Federal

- Canadian Environmental Protection Act

### Provincial

- Environmental Enhancement and Protection Act
- Forest and Prairie Protection Act
- Forest and Prairie Protection Regulation
- Forest and Prairie Protection (Ministerial) Regulation
- Fire Control Zone Regulation
- Forest Protection Area Regulation
- Municipal Government Act

### **Enforcement and monitoring**

#### Federal

The Canadian Environmental Protection Act provides the regulatory framework for setting air quality standards across the country. Environment and Climate Change Canada (ECCC) plays a role in setting standards, monitoring, and research on a national level. ECCC provides monitoring equipment and a centralised national database for the air quality information.

The Canadian Air Quality Management System provides a comprehensive, cross-Canada framework for intergovernmental collaborative action to further protect human health and the environment through continuous improvement of air quality. The Canadian Ambient Air Quality Standards are set for airshed zones in each province and drive air quality management across the country. Federal, provincial and territorial governments have specific roles and responsibilities.

The National Air Pollution Surveillance Program assesses the quality of ambient air in populated regions of Canada and is a cooperative agreement between the federal government and provinces. The National Air Pollution Surveillance Program has 286 sites in 203 communities located in every province and territory. These measurements are used by the provinces to report Air Quality Index and by ECCC to report the Air Quality Health Index.

Through the Canadian Air Quality Management System, the Canadian Council of Ministers of the Environment's Air Quality website provides the most current information on air quality by reporting the Canadian Ambient Air Quality Standards across Canada. Alberta is a member of the Canadian Council of Ministers of the Environment. The Canadian Council of Ministers of the Environment has developed federal standards for particulate matter and ground-level ozone.

#### Provincial

The Environmental Enhancement and Protection Act, implemented by the Alberta Ministry of Environment and Protected Areas (MEPA), provides the provincial regulatory framework regarding air emissions. Alberta has adopted national ambient air quality objectives and standards for a number of contaminants in the atmosphere. Ambient air quality objectives are used to gauge current and historical air quality, guide airshed planning efforts, develop regulatory frameworks, and

## Annex 1 Detailed findings for Supply Base Evaluation

management strategies such as air quality advisories. Provincial air quality objectives, and Canadian Ambient Air Quality Standards are part of the criteria in the management of air contaminants. Air quality monitoring is guided by Alberta's Air Monitoring Directive.

Alberta has six air zones, based on the Land-use Framework Regions. The Ministry of Forestry and Parks (MFP) is responsible for wildfire activities inside the forest protection area, as established by the Forest Protection Area Regulation under the Forest and Prairie Protection Act (FPPA). Cities, towns, villages, counties and municipal districts are responsible for wildfire activities outside of the forest protection area. MFP is responsible for the implementation and governance of the FPPA, which is the primary legislation enabling the protection of the forests and prairies from wildfire. The FPPA regulates industrial operations for wildfire prevention.

Fire permits are required for all burning activities, except campfires, in the forest protection area of Alberta during wildfire season (1 March to 31 October). Fire permits ensure safe burning practices and allow MFP staff to know where burning is approved. Under the FPPA, industrial operations on Crown land or within one kilometre of any public land must submit a fire control plan to MFP.

The Debris Management Standards for Timber Harvesting Operations provides guidance to consider alternative methods of waste disposal (mulching, chipping, air curtain sumps, etc.) to burning. The Debris Management Standards also focuses on handling of debris in zones around communities to reduce wildfire risk.

Debris piles are to be disposed of within the 12-month debris disposal timelines set out in the Forest and Prairie Protection (Ministerial) Regulation. All debris disposal obligations are identified and submitted in the Annual Operating Plans (AOPs) by timber disposition holders.

Under the Municipal Government Act, municipalities may create bylaws which address burning within municipal boundaries. Municipalities may also have rules and restrictions in place for burn permits.

### Provincial

Air quality monitoring is conducted as part of the Alberta Environmental Science Program, implemented by MEPA, in cooperation with ECCC and industry. There are approximately 65 ambient air quality monitoring stations in the province. Monitoring stations measure the presence of contaminants in the air. Data is compared to regional, provincial and national standards and objectives. ECCC conducts audits of provincial air quality monitoring stations. Information from the monitoring stations informs the Air Quality Health Index which reports current air quality results to the public of Alberta. Annual air zone reports are published by MEPA.

MFP reviews and approves timber disposition holder AOPs, which includes list of areas with debris piles to be burned and considers effective implementation of the Debris Management Standards for Timber Harvesting Operations.

MFP forest officers administer forestry and wildfire-based compliance activities in the forest protection area of Alberta. Forest officers issue fire permits and use additional compliance measures, such as fire control orders (order to remove or reduce fire danger). The Royal Canadian Mounted Police (RCMP) and other Alberta government appointed peace officers have authority under the FPPA for compliance and enforcement activities on forested lands in Alberta. Corporations can face administrative penalties of up to \$100,000 per offence per day, for failing to comply with the FPPA and Regulations for less severe industrial based offences. Violation tickets are issued for non-compliances, ranging from \$360 to \$1,200 per violation. Under FPPA, municipalities have jurisdiction over the control of fire hazards within municipal boundaries. Municipal governments can provide an order to an owner or person in control of the land to remove or eliminate a fire hazard within a fixed time.

Depending on the nature of air quality complaints, MEPA or MFP are responsible for the respective legislation and take enforcement actions as necessary, including following up on complaints. The energy and environmental response line can be called to report complaints about air quality. To report a wildfire or open burning violation, individuals are to call 310-FIRE.

The most current information on the status of Canada's air quality is reported on the Canadian Council of Ministers of the Environment Air Quality website. As of March 2024, the site states that 3,239 tonnes of fine particulate matter, representing 1.57% of all fine particulate matter was emitted from prescribed burning and

## Annex 1 Detailed findings for Supply Base Evaluation

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|                                     | <p>structural fires across Canada. Prescribed burning and structural fires were not found to emit a significant amount of nitrogen oxides, sulphur oxides and volatile organic compounds, the other three emissions that are tracked nationally. In response to the Canadian Ambient Air Quality Standards assessment of Alberta, MEPA committed to developing regional actions for all six air zones.</p> <p>Canada’s State of the Forest Annual Reports reported 1,342 wildfires burned 54,088 ha of forest in 2021, 723 wildfires burned 3,275 ha in 2020, and 981 wildfires burned 88,407 ha in 2019.</p> <p>The Status of Air Quality in Alberta: Air Zones Reports from 2017 to 2021 indicated that Alberta did not exceed its set targets for fine particulate matter emissions in any of the established air zones. Wildfire smoke was the largest contributor to fine particulate matter in the province in the 2019-2021 Report.</p> <p>The FPPA does not require administrative penalties to be published. Air quality monitoring data is available on the MEPA Air Quality Data and Reports website.</p> <p><b>Risk conclusion and justification</b></p> <p>There is a federal and provincial regulatory framework governing levels of air emissions. There is ongoing monitoring and public reporting of air emissions. National and provincial results verify that air emission thresholds are being met. All Alberta air zones are meeting fine particulate matter thresholds. Forest industry is operating within industry best practices. Based on evidence reviewed, this Indicator is designated as low risk for Crown land and private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with experts</li> <li>● Interview with suppliers</li> </ul>   |

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| <p><i>Evidence reviewed</i></p> | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Canadian Council of Ministers of the Environment Air Quality Report</a></li> <li>• <a href="#">Canadian Environmental Protection Act</a></li> <li>• <a href="#">National Air Pollution Surveillance Program</a></li> <li>• <a href="#">Local Air Quality Health Index</a></li> <li>• <a href="#">The State of Canada’s Forests Annual Report (2022)</a></li> <li>• <a href="#">The State of Canada’s Forests Annual Report (2021)</a></li> <li>• <a href="#">The State of Canada’s Forests Annual Report (2020)</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Air Monitoring Directive (2016)</a></li> <li>• <a href="#">Air quality Data and Reports</a></li> <li>• <a href="#">Air Quality Health Index</a></li> <li>• <a href="#">Forest and Prairie Protection Act</a></li> <li>• <a href="#">Forest And Prairie Protection Regulation</a></li> <li>• <a href="#">Forest and Prairie Protection (Ministerial) Regulation</a></li> <li>• <a href="#">Debris Management Standards for Timber Harvest</a></li> <li>• <a href="#">MEPA Compliance Assurance Annual Reports</a></li> <li>• <a href="#">MEPA Energy and Environmental Response Line</a></li> <li>• <a href="#">Status of Air Quality in Alberta: Air Zones Reports</a></li> <li>• <a href="#">Status of Air Quality in Alberta: Air Zones Report 2019-2021</a></li> <li>• <a href="#">Status of Air Quality in Alberta: Air Zones Report 2018-2020</a></li> <li>• <a href="#">Status of Air Quality in Alberta: Air Zones Report 2017-2019</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b><br/>Private Land <b>Low risk</b></p>  |
| <p><b>2.2.7</b></p>             | <p><b>Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b></p>   |

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This indicator will use the terms 'chemical use' or 'use of chemicals' to address pesticides, herbicides, insecticides, and fungicides collectively. In some instances, a specific term may be used. Integrated Pest Management is a decision-making process for managing pests effectively, economically, and environmentally soundly. Integrated Pest Management techniques range from preventative and cultural measures to the use of biological, physical, behavioural, and chemical controls. This Indicator intends to minimise chemical use and ensure other non-chemical strategies and/or practices are considered and defined in industry best practices.

A banned chemical is one that has been prohibited within one or more categories by final regulatory action, with the aim of safeguarding human health or the environment. The classification of chemicals as banned is a result of the processes outlined in International Conventions (Stockholm and Rotterdam) on sustainability and the environment. These processes lead to the compilation of a 'banned' list of chemicals, which individual countries then incorporate into respective national lists. Refer to Indicator 4.1.8 Training to Workers for forestry-related training, Indicator 4.1.10 for Worker H&S Safeguards and Indicator 2.2.8 Waste Disposal.

The primary threat from the use of chemicals in forest management is the possible adverse effects on the health of humans, wildlife, and fisheries. If misused or inadequately monitored, chemical use can also lead to loss of insect and plant biodiversity.

### Federal

- Pest Control Products Act
- Pest Control Products Regulations
- Pest Control Products Incident Reporting Regulations
- Pest Control Products Sales information Reporting Regulations
- Hazardous Products Act

### Provincial

- Environmental Protection and Enhancement Act (EPEA)
- Pesticide (Ministerial) Regulations
- Pesticide Sales, Handling, Use, and Application Regulation
- Environmental Code of Practice for Pesticides Crown Land
- Forests Act
- Timber Management Regulation

### **Enforcement and monitoring**

#### Crown Land and Private Land

The Pest Control Products Act enables the Pest Management Regulatory Agency federally. Pesticides that fall under the Act include herbicides and insecticides. A federal public registry, based on the lists from International Conventions, identifies pest control products registered for use in Canada. Only chemicals registered by the federal government may be used in Alberta. The federal Pest Control Products Act and regulations aim to ensure pesticides are used, stored and disposed of with minimum impact on non-target species, human health, or the environment. The Ministry of Environment and Parks (MEPA) has authority to administer pesticide use and Integrated Pest Management. These practices are described and regulated under Environmental Protection and Enhancement Act (EPEA).

MEPA determines requirements/qualifications of individuals applying herbicides, including requirements for certified pesticide applicators and authorised assistants. Certification is administered by Lakeland College. MEPA is responsible for responding to public inquiries and complaints. This requirement applies for pesticide use on crown land and private land. EPEA enables the Pesticide Management Regulation and the Pesticide Sales, Handling, Use, and Application Regulation. MEPA administers EPEA as it applies to

## Annex 1 Detailed findings for Supply Base Evaluation

chemical use in forest operations. The Environmental Code of Practice for Pesticides handles all legal practice requirements with regards to sale, handling, use, and application of herbicides and pesticides. The Environmental Code of Practice for Pesticides provides requirements of registered applicators and sales agents, guidance for aerial pesticide applications, forest management herbicide, and pesticide applications and vendor requirements for small operations.

### Crown Land

Additionally, on Crown land, the Alberta Ministry of Forestry and Parks (MFP) has authority to administer the Forests Act. The use of herbicides for forest management on Crown land is further restricted and permitted by MFP. When approving permits, MFP reviews multiple items, including location of herbicide application and mix-sites, application of herbicide consistent with reforestation objectives and silviculture strategy, consultation requirements and data entry into the Alberta Regeneration Information System.

Crown land planning and reporting of pesticide use is detailed in the Alberta Timber Harvest and Planning Operating Ground Rules (OGR) through the Reforestation Program in the Annual Operating Plan (AOP). Specific requirements are detailed in the Forest Management Herbicide Reference Manual and include herbicide applicator permits and details on chemicals to be used, application method, timing, and intensity.

### Private Land

The Forest Management Herbicide Reference Manual applies to private land herbicide use in forest regeneration planning and practices. On private land, reporting herbicide to MFP is not required.

### Crown Land and Private Land

Federally, the Pest Management Regulatory Agency has oversight for the registration and approval of chemicals for intended use. MEPA enforces the use of pesticides in forest operations through the Compliance Assurance Program. MEPA conducts field inspections and investigations of incidents with follow up enforcement action if there are contraventions. Monitoring requirements during application are detailed in the Environmental Code of Practice for Pesticides. The MEPA complaints mechanism process can be used if there are issues found with pesticide use on Crown or private land.

### Crown Land and Private Land

The Stockholm Convention (2019) identifies 16 pesticides, 13 industrial chemicals, 3 chemicals categorised as both a pesticide and industrial chemical and 7 chemicals as unintentional production. The chemicals are organised into three categories: elimination, restriction and unintentional production.

In the Rotterdam Convention Annex III dated October 2023, there are 55 chemicals listed which include 36 pesticides, 18 industrial chemicals and 1 chemical in both the pesticide and industrial chemical categories, which have been banned or severely restricted for health or environmental reasons.

PAN International Consolidated List Of Banned Pesticides produces an annual updated list by country. The most current was dated May 2022. Canada has 32 chemicals listed that include pesticides and industrial chemicals. PAN International Consolidated List Of Banned Pesticides produces an annual updated list by country. The most current was dated May 2022. Canada's list includes 32 banned pesticides and industrial chemicals. Only chemicals registered by the federal government may be used in Alberta.

### Crown Land & Private Land

MEPA publishes Compliance Assurance Annual Reports, which detail enforcement actions taken by MEPA from written warnings, orders, administrative penalties, compliance orders, and prosecutions. EPEA contraventions are publicly available. There are no contraventions related to pesticide use from 2018 to 2023 related to forestry use on Crown or private land.

### **Risk conclusion and justification**

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|-------------------------------------|--|
|                                     | <p>Only chemicals registered by the federal government may be used in Alberta. There is federal and provincial legislation on herbicide and pesticide safe use and application for both Crown land and private land in Alberta.</p> <p><u>Crown Land</u></p> <p>Additionally, there is publicly available information to ensure that MEPA and MFP are monitoring herbicide use for compliance, and using enforcement as identified with compliance assurance. Controls and procedures in place, and there is no indication of systemic non-compliance. Based on evidence reviewed, this Indicator is designated at low risk for crown land in Alberta.</p> <p><u>Private Land</u></p> <p>Additionally, there is publicly available information to ensure that MEPA are monitoring herbicide use for compliance, and using enforcement as identified with compliance assurance for private land. Controls and procedures in place, and there is no indication of systemic non-compliance. Based on evidence reviewed, this Indicator is designated at low risk for private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with experts</li> <li>● Interview with suppliers</li> </ul>  |

## Annex 1 Detailed findings for Supply Base Evaluation

|                                 |  |
|---------------------------------|--|
| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">All POPs listed in the Stockholm Convention</a></li> <li>• <a href="#">PAN International Consolidated List Of Banned Pesticides</a></li> <li>• <a href="#">Rotterdam Convention Annex III Chemicals</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Pest Control Products Act</a></li> <li>• <a href="#">Pest Control Products Incident Reporting Regulations</a></li> <li>• <a href="#">Pest Control Products Regulations</a></li> <li>• <a href="#">Pest Control Products Sales information Reporting Regulations</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Environmental Code of Practice for Pesticides</a></li> <li>• <a href="#">Alberta Forest Management Herbicide Reference Manual (2023)</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Environmental Protection and Enhancement Act</a></li> <li>• <a href="#">MEPA Compliance Assurance Activities and Enforcement Actions</a></li> <li>• <a href="#">MEPA – Compliance Assurance Annual Reports</a></li> <li>• <a href="#">MEPA Compliance Assurance Program</a></li> <li>• <a href="#">MEPA Enforcement Actions - Quarterly</a></li> <li>• <a href="#">MEPA Pesticide Management</a></li> <li>• <a href="#">MEPA Using Pesticides – Applicator Certification Program</a></li> <li>• <a href="#">MFP – Forest Pests and Damage Agents</a></li> <li>• <a href="#">Pesticide (Ministerial) Regulation</a></li> <li>• <a href="#">Pesticide Sales, Handling, Use and Application Regulation</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>  |
| <p><b>2.2.8</b></p>             | <p><b>Waste shall be disposed of in an environmentally appropriate manner.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>The European Union defines waste as “any substance or object that the holder discards or intends to discard or is required to be discarded.”</p>   |

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According to the European Union Commission's guidance on the Classification of Waste, the following types of hazardous environmental waste apply within the context of forest management activities and are the focus of this Indicator:

- Oil wastes and wastes of liquid fuel;
- Waste organic solvent, refrigerants, and propellants; and
- Waste packaging: absorbents, wiping cloths, filter materials and protective clothing not otherwise specified.

Indicator 2.2.4 Residue Removal Minimises Neg Impact to Ecosystems covers the retention of wood waste and post-harvest residue from forest management activities. Refer to Indicator 4.1.8 Training to Workers for forestry-related training and 4.1.10 for Worker H&S Safeguards training requirements related to the respective indicators. Refer to 2.2.7 Pesticides & Pest Management Comply with Laws for pesticide use.

Leaving waste in the forest causes pollution which enters the ecosystem in numerous ways, depending on the nature of the waste and the site. Waste fluids may enter waterways and/or pose a direct hazard to wildlife. Waste also compromises aesthetic values and recreational use opportunities. Over the longer term, persistent pollution from inadequate waste disposal can negatively impact public health, wildlife, and the ecosystem.

### Federal

- Canadian Environmental Protection Act
- Hazardous Products Act and its Regulations

### Provincial

- Environmental Protection and Enhancement Act (EPEA)
- EPEA, Activities Designation Regulation
- EPEA, Administrative Penalty Regulation
- EPEA, Waste Control Regulation
- EPEA, Tire Designation Regulation
- EPEA, Waste Control Regulation
- EPEA, Release Reporting Regulation
- EPEA, Substance Release Regulation
- EPEA, Remediation Regulation
- Occupational Health & Safety Act,
- Occupational Health & Safety Act, Occupational Health and Safety Code (WHMIS)
- Public Lands Act
- Municipal Government Act

### **Enforcement and monitoring**

#### Federal

Health Canada is the federal government agency responsible for regulating pollution caused by inadequate waste disposal through the Canadian Environmental Protection Act (1999). The Act provides for codes of practice, requirements to set environmental quality objectives, and the provision of guidelines recommending limits on the release of substances into the environment. Health Canada is responsible for the Workplace Hazardous Materials Information System (WHMIS), which is a federal hazard

## Annex 1 Detailed findings for Supply Base Evaluation

communication standard under the Hazardous Products Act. WHMIS is implemented through coordinated federal and provincial legislation. Health Canada acts as the secretariat for the federal and provincial government partner system. Each province is responsible for establishing WHMIS requirements for employers. Suppliers, employers, and workers each have requirements under WHMIS.

Suppliers who sell or import a hazardous product must identify if the product is a hazardous product, prepare labels and Safety Data Sheets, and provide the labels and Safety Data Sheets to buyers who intend to use the hazardous products for workplace use. Employers must educate and train workers on the hazards and safe use of hazardous products in the workplace, ensure hazardous products are properly labelled and ensure appropriate control measures are in place to protect the health and safety of workers. Workers must participate in WHMIS training programs, take necessary steps to protect themselves and coworkers, and participate in identifying and controlling hazards.

### Provincial

The Occupational Health and Safety Code in Alberta outlines WHMIS requirements. The Ministry of Jobs, Economy and Trade (MJET) is responsible for enforcing the Occupational Health and Safety Act and the Occupational Health and Safety Code. MJET also has an agreement with Health Canada to enforce the federal Hazardous Products Act.

The Ministry of Environment and Protected Areas (MEPA) is responsible for the Environmental Protection and Enhancement Act (EPEA) and numerous associated Regulations in Alberta. The Regulations provide for approvals and management associated with recycling or landfilling operations respective of hazardous waste products. The Activities Designation Regulation works in conjunction with the Waste Control Regulation to establish conditions for waste management or recycling activity, permitted under an authorisation, registration, or notification. The Waste Control Regulation details proper management waste requirements in Alberta, which includes specific storage for hazardous waste and hazardous recyclables. The Waste Control Regulation provides acceptable industry practices. The Administrative Penalty Regulation defines contraventions including unauthorised release of a substance, unauthorised disposal of waste, and non-reporting.

The Tire Designation Regulation designates tires as a recyclable material and associated environment fees.

The Release Reporting Regulation defines what must be reported, when, how, and to who report must be made. Any spill that may cause, is causing, or caused an adverse effect to the environment must be immediately reported to MEPA. Reports can be made by phoning, in person at a MEPA office, or electronically. Release Reporting Regulation and the Substance Release Regulation provide the mechanisms for managing and reporting accidental releases. Remediation Regulation enables issuance of remediation certificates for clean-up liabilities to the current standards. Illegal activity or other enforcement concerns in Alberta can be reported to 310- LAND.

### Crown Land

Additionally on Crown land, MEPA is responsible for the Public Lands Act, which prohibits the accumulation of waste material, debris, refuse, or garbage on public land.

Littering on Crown land can be reported via phone call, through 310-LAND. Crown timber disposition holders and contractors operating on Crown land in Alberta maintain management systems that include procedures for managing waste and spills. Timber disposition holders include requirements, either in contracts or prework documents, that specify appropriate waste management practices. Timber disposition holders have a company response plan for spills that address and meet regulatory requirements. These plans frequently contain best management practices and procedures, as well as company-specific forms for recording spill response.

### Private Land

Additionally, for private land, if waste is on municipal property, local municipalities must be contacted. It is common for municipalities to have litter bylaws, but each municipality bylaw is unique. Litter bylaws may include a complaints process.

### Provincial

Alberta Occupational Health and Safety officers have authority to enforce Occupational Health and Safety Act, and the Occupational Health and Safety Code (WHMIS) through conducting inspections, issuing orders, writing violation tickets, and issuing administrative penalties. There is an Employers Records Database on the MJET website, which

## Annex 1 Detailed findings for Supply Base Evaluation

has searchable information about all employers insured by Alberta's Workers' Compensation Board, including information related to WHMIS conformance. All enforcement actions, including administrative penalties, orders and convictions issued against employers are publicly available in the Employers Records Database.

MEPA is responsible for governing legislation related to waste management and for responding to complaints. MEPA's environmental compliance model uses a consistent, risk-based approach to ensuring compliance. Inspections ensure requirements are being followed to protect the environment and human health. MEPA responds to reports and has the authority to provide enforcement action through the EPEA depending on the investigation results. Failure to report incidents to MEPA may result in enforcement action.

### Crown Land

Additionally, the Alberta Ministry of Forestry and Parks (MFP) conducts forest operations inspections on Crown land through the Forest Operations Monitoring Program (FOMP) and has the ability to enforce fines. FOMP does not have performance measures for waste disposal; however, it is an element of FOMP inspections.

### Private Land

Additionally, municipalities can take actions of enforcement through municipal bylaws. Enforcement are fines to the offender of littering on private land.

### Provincial

The MJET database contains publicly available contravention results at a company level, including WHMIS conformance; however, there is no summary rollup for all companies. Convictions under the Occupational Health and Safety Act and Regulation in Alberta from 2010 to 2024 are publicly available, but none are identified as WHMIS contraventions. MEPA publishes publicly available Compliance Assurance Annual Reports, which indicates the number of compliance inspections conducted annually. MEPA environmental compliance and enforcement orders and reports are publicly available as a summary, or individually, by quarter. Current MEPA administrative penalties and a historical environmental enforcement search related to the EPEA are publicly available. In 2022, one warning letter related to waste disposal was sent to a forestry company operating on Crown land. From 2018 to 2023, no other forest practices-related waste disposal contraventions were listed on Crown land or private land.

### **Risk conclusion and justification**

#### Crown Land

There is a comprehensive regulatory framework, compliance, and enforcement systems, including reporting to address the handling and disposal of waste to minimize negative impacts. Licensees have practices in place to minimise spills and garbage left on site after operations. The forest industry also has a duty to self-report and to implement remediation procedures. The controls and procedures in place, and there is no indication of systemic non-compliance. Based on evidence reviewed, this Indicator is designated at low risk for Crown land in Alberta.

#### Private Land

There is a comprehensive regulatory framework in place to ensure that waste disposal is handled through the appropriate municipal government or MEPA for private land. Any contravention on private land can be found on MEPA's website. The controls and procedures in place, and there is no indication of systemic non-compliance. Based on evidence reviewed, this Indicator is designated as low risk for private land in Alberta.

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### *Means of verification*

- Regulatory framework
- Regulatory agency websites
- Forest management plans
- Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures
- Chain of custody procedures, including fibre tracking
- Fibre procurement policy & procedures
- Regulatory compliance and enforcement data/reports
- Oversight agency database records and/or reports
- Watershed and/or riparian assessments, applicable to the supply base area
- Site plans and/or post-activity inspections demonstrate negative impacts mitigated
- Supplier verification program
- Interviews with regulatory/oversight agency
- Interview with experts
- Interview with suppliers

## Annex 1 Detailed findings for Supply Base Evaluation

|                                 |  |
|---------------------------------|--|
| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">European Commission – Commission notice on technical guidance on the classification of waste</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Canadian Environmental Protection Act</a></li> <li>• <a href="#">Hazardous Products Act and its Regulations</a></li> <li>• <a href="#">Workplace Hazardous Materials Information System 2015</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Activities Designation Regulation</a></li> <li>• <a href="#">Administrative Penalty Regulation</a></li> <li>• <a href="#">Environmental Protection and Enhancement Act</a></li> <li>• <a href="#">MEPA Compliance Assurance Annual Reports</a></li> <li>• <a href="#">MEPA Current Administrative Penalties</a></li> <li>• <a href="#">MEPA Historical Environmental Enforcement Search</a></li> <li>• <a href="#">MEPA Environmental Compliance Enforcement – Orders and Reports</a></li> <li>• <a href="#">Municipal Government Act</a></li> <li>• <a href="#">Occupational Health and Safety Act</a></li> <li>• <a href="#">Occupational Health and Safety Code (WHMIS)</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Release Reporting Regulation</a></li> <li>• <a href="#">Remediation Regulation</a></li> <li>• <a href="#">Substance Release Regulation</a></li> <li>• <a href="#">Tire Designation Regulation</a></li> <li>• <a href="#">Waste Control Regulation</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>  |
| <p><b>2.2.9</b></p>             | <p><b>Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.</b></p>  |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b></p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

The assessment of this Indicator considers whether long-term sustainable harvest levels have been determined using appropriate information and assumptions and whether actual harvests are below these levels. Forest inventory and yield curves are key determinants of the long-term sustainable harvest levels used in forest estate modelling. Long-term sustainable harvest levels cannot exceed the annual net growth rate of the forest, with losses due to natural disturbances taken into account. An annual allowable cut (AAC) is determined from this long-term sustainable harvest level. The AAC represents the upper annual harvest limit during the management plan term. Biomass Producers in Alberta source the majority of fibre from mill residues. The balance is obtained by grinding roadside harvesting slash or chipping low-grade roundwood. Fibre from these sources is not volume that counts against the AAC. See Section 4.8 – Overview of the Biomass Sector as well as Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem.

Timber harvesting that exceeds the long-term sustainable harvest level of the forest is unsustainable and will erode the productivity of the forest, ecosystem services and the timber supply it produces.

### Crown Land

- Forests Act
- Forest Act, Timber Management Regulation Private Land

There is no regulatory framework that requires the determination and maintenance of long-term sustainable harvest levels on private land.

### **Enforcement and monitoring**

#### Crown Land

The Alberta Ministry of Forestry and Parks (MFP) has authority to administer the Forests Act which provides the regulatory framework to enable the determination of long-term sustainable harvest levels on Crown land. Under the Forests Act, MFP has the authority to award forest tenure. The two major forms of tenure are FMAs and timber quotas. An FMA enables the holder to establish, grow, and harvest “timber in a manner designed to provide a yield consistent with sustainable forest management principles and practices”. A timber quota gives the holder the right to harvest a specified volume of species identified in the quota. Quotas may be issued within FMA areas or on Crown land outside of FMAs. The FMA requires the holder to prepare a Forest Management Plan (FMP) every ten years, following the direction and standards provided in the Alberta Forest Management Planning Standard, Version 4.1 (2006). This Standard is the most current version and is based on Canadian Standards Association Can/CSA-Z809- 2002 standard. The Standard provides direction for forest management planning on Crown land consistent with the principles of sustainable forest management.

The Alberta Forest Management Planning Standard provides a set of requirements regarding the timber supply analysis, including the specification of the minimum inventory standards and the construction of yield curves. Timber supply analysis is a process of data collection and analysis, re-analysis, and consultation via public advisory groups, which are requirements of the FMPs. Timber supply analysis results in the determination of the AAC. The FMPs do not prescribe the methodology for determining how the AAC is calculated.

MFP publishes the Forest Management Plan Approval Decision, applicable to each FMP on the MFP website. This document provides MFP’s rationale which may include binding conditions that must be met by the FMA holder who provided the FMP.

MFP is legislatively allowed to approve a temporary rise in the AAC to target susceptible and damaged/dead timber. Alberta allows the actual harvest in any particular year or period to exceed the AAC, as long as the actual harvest is within the AAC bounds over the term of the plan.

#### Private Land

As of March 2024, there is no requirement to calculate long-term sustainable harvest levels. As such, there is no publicly available information describing whether or how long-term sustainable harvest levels are determined.

## Annex 1 Detailed findings for Supply Base Evaluation

Actual harvest level from other private land is the result of the decisions of individual land owners. Historically, actual harvest levels from private land is variable, usually rising as the market price for timber increases and declining when it falls.

### Crown Land

MFP reviews AACs as part of the FMPs review to ensure FMPs have been developed in a manner consistent with government direction. The FMP review process includes a review by the FMA-holder's public advisory group, which may comment on the allowable harvest level. Forest operations and harvest levels are tracked on an annual basis and consolidated into five-year quadrants as per the Timber Management Regulation production control period. A quadrant is a quarter of the term of an FMP (i.e., the first quadrant is the first five years of the plan term). The timber harvest during one quadrant cannot exceed 110% of the quadrant AAC. If the harvest exceeds the quadrant AAC, the allowable harvest in the next quadrant is reduced by the amount that the harvest exceeded the AAC. During the entire plan term, the harvest must be at or below the AAC.

### Private Land

As of March 2024, the Annual Allowable Cut (AAC) is not calculated on private forest land in Alberta and there is no publicly available information describing an oversight framework for long-term sustainable harvest levels on private land.

### Crown Land

Alberta's Forest Economy 2023: A Handbook of Public Economic and Socioeconomic Accounts reported timber harvesting data for the 2020/2021 fiscal year (last reported data). Approximately 89% of timber harvested in 2020/2021 was sourced from provincial lands. Conifer harvest accounted for 18.3 million m<sup>3</sup> and 7.9 million m<sup>3</sup> of deciduous was harvested. In the same year, the AAC on provincial lands was 29.5 million m<sup>3</sup>—17.2 million m<sup>3</sup> of coniferous timber and 12.2 million m<sup>3</sup> of deciduous timber. In all years reported in the Alberta's Forest Economy 2023 report (fiscal 2013/2014 to 2020/2021), the actual conifer harvest is below the AAC by an average of 3.1 million m<sup>3</sup>/year. The actual hardwood harvest never exceeded the AAC during the same period. On affected FMAs, MFP has approved accelerated harvests to address mortality of lodgepole pine due to the mountain pine beetle.

### Private Land

As reported in the Alberta's Forest Economy 2023, 11% of the timber supply comes from private land. 2.6 million m<sup>3</sup> is deciduous species and 0.8 million m<sup>3</sup> coniferous species.

### **Risk conclusion and justification**

#### Crown Land

There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels and regulating actual harvest volumes. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data. MFP approves long-term sustainable harvest levels, as well as monitors actual harvest levels. MFP reports and databases provide data to verify actual harvest volumes are below the long-term sustainable harvest levels. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.

#### Private Land

Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of harvest levels, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |   |
|------------------------------|---|
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Timber supply analysis, applicable to the supply base area</li> <li>• AAC vs actual harvest analysis, applicable to the supply base area</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with experts</li> <li>• Interview with suppliers</li> </ul> |
| <i>Evidence reviewed</i>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>• <a href="#">Alberta's Forest Economy 2023: A Handbook of Public Economic and Socioeconomic Accounts</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Forests Act – Revised Statutes of Alberta 2000; Chapter F-22</a></li> <li>• <a href="#">Forest Management Plans</a></li> <li>• <a href="#">Provincial Timber Harvest and Annual Allowable Cut, Alberta Crown Lands</a></li> <li>• <a href="#">Quota Production Chargeability</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Timber Production Monitoring (previously 98-05)</a></li> </ul>   |
| <i>Risk rating</i>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>   |
| <b>2.2.10</b>                | <b>Harvested areas shall be regenerated.</b>  |
| <i>Findings</i>              | <b>Scale of assessment</b>  |

Crown Land, Private Land

### **Analysis**

To ensure future forests, regeneration with natural or planted seedlings following harvest must be prompt and adequate. Sufficiency is a measure of species selection, seedling distribution, and time of establishment. Species selection needs to be consistent with site ecology (i.e., original stand composition, ecosite, and natural disturbance) and considerate of future climate change risks. Distribution must be sufficient to allow future crop trees to occupy the site in a free-growing state, and timing needs to be prompt enough to allow early establishment unhindered from competing vegetation. The terms regeneration and reforestation are interchangeable for this Indicator. See Indicator 2.2.1 Conversion – a, b, c, d and Indicator 2.2.12 Genetically Modified Trees are Not Used.

Inadequate regeneration can result in a considerable time delay following harvest, unacceptable species, inadequate control of competing vegetation, and significantly uneven density. These will compromise future forest fibre harvest volume and value, as well as ecosystem functions and related productivity.

#### Crown Land

- Forests Act
- Timber Management Regulation

#### Private Land

- Municipal Governments Act

### **Enforcement and monitoring**

#### Crown Land

The Alberta Ministry of Forestry and Parks (MFP) is responsible for ensuring that reforestation is completed on Crown lands. The Forests Act (2000) regulates harvest on Crown land, and the Timber Management Regulation regulates forest regeneration. Reforestation in Alberta is the responsibility of timber disposition holders who harvest trees on Crown land. The Reforestation Standard of Alberta provides the procedures to assess the level of reforestation success in managed stands following harvest. It enables the assessment of each opening to determine the adequacy of stocking, survival, growth and tree species composition and assesses the reforestation performance of each opening relative to the yield and strata assumed in the Forest Management Plan (FMP).

There are two objectives related to regeneration compliance in Crown land five- year stewardship reporting—the percent of satisfactorily reforested harvest areas by year and the cumulative percentage of area of harvest areas meeting reforestation standards. A reforestation program is a component of the Annual Operating Plan (AOP) each year. The AOP links reforestation operations to the FMP. Best management practices and legal ground rules for regeneration are identified in the Alberta Timber Harvest Planning and Operating Ground Rules (OGRs). Timber licence and permit holders are charged a reforestation levy and the reforestation activity is conducted by MFP.

#### Private Land

Alberta Municipal Affairs is responsible for ensuring regeneration occurs, if applicable, based on individual municipal laws. As of March 2024, there is no publicly available information describing implementation mechanisms for regeneration on private land.

#### Crown Land

MFP monitors regeneration activities through its Forest Operations Monitoring Program (FOMP), which is certified to the ISO 9001:2015 quality management system standard. FOMP inspections are directly linked to the OGRs.

There are two levels of monitoring in the FOMP: timber disposition holder monitoring and MFP monitoring. FOMP inspections are conducted on harvesting operations, road construction and silviculture activities. FOMP procedures require a minimum target for inspections. Frequency of inspections can be increased based on results

## Annex 1 Detailed findings for Supply Base Evaluation

of previous inspections, and/or through a risk-rating protocol. FOMP results are compiled annually and MFP verifies compliance levels. Timber disposition holders and/or MFP identify non-conformances through non-conformance reporting at the applicable levels of FOMP monitoring. A corrective action plan must be submitted and approved by MFP for all non-conformances to minimise the risk of re-occurrence. MFP is responsible for the oversight and approval of Alberta Regeneration Information System submissions. Timber disposition holders must report silviculture activities into the system by May 15 each year for review and approval by MFP.

### Private Land

On private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework for regeneration on private land.

### Crown Land

The Annual Status of Reforestation in Alberta Reports indicated the following compliance related to regeneration from 2015 to 2020:

| Timber Year | Regeneration Target (%) |       |
|-------------|-------------------------|-------|
|             | Met or Exceeded         | <50%  |
| 2019/20     | 79.41%                  | 0.97% |
| 2018/19     | 79.83%                  | 0.71% |
| 2017/18     | 86.76%                  | 0.11% |
| 2016/17     | 84.81%                  | 0.16% |
| 2015/16     | 86.37%                  | 0.17% |

Forests Act contraventions are publicly available for the past five years on the MFP website. In 2023, there were two contraventions related to reforestation. In 2022, there were six contraventions related to overdue regeneration surveys. In 2021, there were two contraventions related to overdue regeneration surveys. There were no reportable contraventions related to regeneration from 2018 to 2020. MFP FOMP data verified regeneration compliance was 86% for 2021/22 and 82% for 2022/23.

### Private Land

As of March 2024, there are no publicly available results to verify the current condition of regeneration for private land.

### **Risk conclusion and justification**

#### Crown Land

There is a comprehensive regulatory framework governing regeneration on Crown land. Silviculture activities are reported annually and are monitored by MFP. The Annual Reforestation Report in Alberta and FOMP data verified timber disposition holders comply with regeneration requirements. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.

#### Private Land

Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of regeneration following timber harvesting, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |   |
|-------------------------------------|---|
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● Regeneration assessments, applicable to the supply base area</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>● Supplier verification program</li> <li>● Interviews with regulatory/oversight agency</li> <li>● Interview with experts</li> <li>● Interview with suppliers</li> </ul>   |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Annual Status of Reforestation in Alberta Report 2019-2020</a></li> <li>● <a href="#">Annual Status of Reforestation in Alberta Report 2018-2019</a></li> <li>● <a href="#">Annual Status of Reforestation in Alberta Report 2017-2018</a></li> <li>● <a href="#">Annual Status of Reforestation in Alberta Report 2016-2017</a></li> <li>● <a href="#">Forests Act</a></li> <li>● <a href="#">Forests Act Contraventions</a></li> <li>● MFP FOMP Inspection Data 2018 – 2023</li> <li>● <a href="#">Timber Management Regulation</a></li> <li>● <a href="#">Regeneration – National Forestry Database</a></li> <li>● <a href="#">Reforestation Standard of Alberta</a></li> </ul> |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>   |

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| <b>2.2.11</b>   | <b>The impacts of natural processes such as fires, pests and diseases shall be managed.</b>  |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>Wildfires, pests, diseases, and windthrow are natural disturbance events that shape the ecological attributes of all forests. These events can be small events such as single tree deaths but most often are stand modifying or replacing events and work to create a persistent landscape pattern related to the dominant disturbance type. Disturbance is essential to forest health and regeneration, although it can pose challenges to tenure holders and communities. Wildfires and insect damage are the primary sources of natural disturbance and cause significantly more temporary forest loss than timber harvesting. Aspects of healthy and vital ecosystem services are addressed in Indicator 2.2.2 Health, Vitality &amp; Other Services. Localised timber diseases are left untreated as they tend to be small, are difficult to control, and generate a variety of key ecological attributes for sustaining biodiversity. Similarly, for wildfires, not all fires need to or should be suppressed. Extensive fire suppression can lead to the build-up of fine fuels, increasing the risk of large-scale fires.</p> <p>Inappropriate management of impact from natural disturbances can lead to:</p> <ul style="list-style-type: none"><li>• Loss or long-term alteration of forest ecosystems;</li><li>• Reduction of productive forest area;</li><li>• Reduction in forest growth rate;</li><li>• Loss of socio-economic benefits from forests;</li><li>• Property losses; and</li><li>• Danger to human lives.</li></ul> <p><u>Federal</u></p> <ul style="list-style-type: none"><li>• Pest Control Products Act</li><li>• Pest Control Products Regulations</li><li>• Plant Protection Act</li></ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"><li>• Forest and Prairie Protection Act</li><li>• Agricultural Pests Act</li><li>• Pest and Nuisance Control Regulation</li><li>• Weed Control Act</li></ul> <p><u>Crown Land</u></p> <ul style="list-style-type: none"><li>• Forests Act</li></ul> <p><b>Enforcement and monitoring</b></p> |

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The federal Acts are implemented through provincial forest ministries and forest legislation. In Alberta, the Forests Act allows the Ministry of Forestry and Parks (MFP) to intervene on Crown and private land to manage natural disturbance events in forests. The Forest and Prairie Protection Act (FPPA) allows MFP to issue fire permits and control wildfires and fire hazards.

### Pests and Diseases

The federal Pest Control Products Act and Pest Control Product Regulations and the provincial FPPA Pest and Nuisance Control Regulation apply to Crown and private land. On Crown land, the Forests Act and Timber Management Regulation enable the forest manager to include values, objectives, indicators and targets (VOITs) related to natural processes including fire and forest insects and disease in the Forest Management Plan (FMP). The FMPs are approved by MFP and reviewed every five years with stewardship reporting. Stewardship reports include responses to provincial programs to reduce forest insect or disease and species of concern risks. On Crown land, timber disposition holders report insect and disease occurrence on tenures in stewardship reports. Alberta has developed the Alberta Forest Pest Diagnostic System, used for both Crown and private land. This allows timber disposition holders and landowners to identify pests by searching for insect, tree species, symptoms, or images. On private land, insect and disease control actions are required for outbreaks identified by MFP. There are no requirements for forest land management planning related to insect and disease control on a regular basis.

### Wildfire

FPPA protects forests and prairies from wildfire and pests. The Act applies to Crown and private land and its regulations establish hazard reduction criteria, fire protection areas, firefighting responsibilities, and fire protection zones.

On Crown land, FMPs are required to have fire management plans. MFP is responsible for prevention, detection, and suppression of wildfires.

On private land, fire suppression and control actions related to outbreaks apply, but there are no requirements for forest land management planning related to fire suppression or monitoring on a regular basis.

### Windthrow

On Crown and private land, MFP is responsible for survey and assessment of fire hazard ratings and wildfire control as well as determining the incidence and extent of wildfires. Annual aerial surveys identify significant windthrow events for both Crown and private land.

On Crown land, windthrow effects are assessed and implemented at the landscape and stand level under the FPPA and the Alberta Timber Harvest Planning and Operating Ground Rules (OGR).

On private land, there are no regulatory requirements for windthrow management.

### Pests and Diseases

MFP is responsible for determining the extent of insect and disease outbreaks on Crown and private land. MFP conducts annual aerial surveys to detect areas of insect and disease infestation and damage for eight insect species.

On Crown land, incidence of natural processes is included as VOITs in timber disposition holders' stewardship reports and included in MFP provincial reporting. MFP has the responsibility to review timber disposition holders' management plans and stewardship reports for alignment of VOITs with government objectives for forest pest management. MFP checks to ensure continual progress on targets and suggests adjustments to plans based on current annual outbreak data.

On private land, there are no regulatory requirement for pest control in terms of annual planning or monitoring. Annual reporting on natural disturbance is provided in the forest pest updates as adjuncts to the Forest Health and Adaptation in Alberta reports. Forest diseases are detected and assessed with annual aerial surveys and confirmed by disease type with ground plots.

### Wildfire

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MFP conducts aerial assessments of wildfire risk, initiation and extent on a weekly based for fire hazard during the fire season and reports damage annually. Through the fire season, MFP provides regular daily fire risk and incidence updates by mapped forest districts on an online wildfire status dashboard. MFP provides annual wildfire statistics by forest district. MFP has a fire prediction and modelling process for evaluating potentially at-risk communities and incorporates strategies that will help reduce the risk to identified communities.

On private land, there are no regulatory requirements for wildfire management in terms of annual planning or monitoring. MFP provides wildland interface support on fire management to municipalities on request.

### Windthrow

On Crown land, windthrow effects are assessed and implemented at the stand level under OGR. Infrequent landscape level windthrow events are assessed through the forest health annual aerial surveys and implemented as salvage at the stand level.

On private land, there are no regulatory requirements for windthrow management in terms of annual planning or monitoring.

The dominant natural disturbances in Alberta forests are wildfire and insects. The annual Forest Health and Adaptation in Alberta report indicates natural disturbances ranged from 2.4 million ha (2021) to 0.9 million ha (2023) in the 2021-2023 period with an annual declining trend. The report does not break down Crown and private land. Numbers listed below in results include both sub-scopes.

### Pests and Diseases

Alberta has developed an action plan, management strategy, and management responsibilities for the mountain pine beetle (MPB) outbreak (ongoing since 2007). There has been a steady decline since 2015 due to the application of sequential spatial harvest sequencing focused on beetle-attacked stands. The current dominant control method is cut and burn. Annual surveys determine MPB hotspots and attack crews are dispersed to cut down dead and dying trees and burn them as quickly as possible. The primary points of attack are on the leading edges to try and reduce the incidence of escape flights downwind.

On Crown land and private land, close to 6.9 million hectares were surveyed in 2019 and approximately 244,250 MPB-affected trees were detected, which is a 45% increase compared to 2018. The number of MPB-affected trees mapped in the Calgary, Edson, and Whitecourt Forest Areas increased. However, the most notable expansion occurred in the Rocky Mountain House region where MPB-affected tree counts increased from approximately 338 in 2018 to 32,123 in 2019.

For the last ten years (2013-2023), survey area ranged from 9.1 million ha (2013) to 6.8 million ha (2023). MPB-affected trees detected ranged from 244,000 in 2019 to 4,300 in 2023. This translates into 3.6 MPB-affected trees/100ha (2019) to 0.1 MPB-affected trees/100 ha in (2023). The difference between MPB and other insect attacks is that most of the MPB damage areas lead to mortality.

From a province-wide perspective, the 2021/2023 report indicated all insect damage ranged from 1.5 million ha (2021) to 534,000 ha (2023) and all diseases ranged from 146,000 ha (2021) to 84,000 ha (2023).

### Wildfire

Wildfires are controlled with initial attack crews and suppression equipment with decisions on deployment dependent on several factors including intensity, extent and proximity to local communities. Wildfire numbers and extent is reported annually, includes both Crown and private land, but does not distinguish between the two. Wildfire burned area from 2017 to 2022 ranged from 2,000 ha in 2020 to 883,000 ha in 2019. Wildfire Management Branch conducted a review of the most destructive fire in 2011, 2015, 2016 and 2019 with a variety of recommendations related to emergency response and protection of local communities. In addition, all reports had local recommendations on improvements in detection and suppression.

### Windthrow

Stand replacing or landscape level windthrow events are not typical in Alberta. On Crown and private land, from 2021 to 2023, the windthrow extent ranged from

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|                                     | <p>8,500 ha (2021) to 1900 ha (2023). Most windthrow is at the stand level and is handled in salvage through the OGR.</p> <p><b>Risk conclusion and justification</b></p> <p>There is a comprehensive regulatory framework to assess, respond, and manage natural disturbances such as pests, disease, wildfire, and windthrow. A framework for prevention and planning of natural processes in place and being followed. Provincial monitoring programs are active for pests, disease, wildfire, and windthrow. Provincial results verify active response and preventative management of the natural processes. Based on evidence reviewed, this Indicator is designated as low risk for Crown land and private land in Alberta.</p>   |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with experts</li> <li>• Interview with suppliers</li> </ul> |

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| <p><i>Evidence reviewed</i></p> | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Plant Protection Act and Regulations</a></li> <li>● <a href="#">Pest Control Products Act</a></li> <li>● <a href="#">Pest Control Products Regulations</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Agricultural Pests Act</a></li> <li>● <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Alberta Wildfire Status dashboard</a></li> <li>● <a href="#">Alberta's Forest Economy A Handbook of Public Economic and Socioecon. Accounts</a></li> <li>● <a href="#">Forest and Prairie Protection Act</a></li> <li>● <a href="#">Forest Health and Adaption in Alberta Report 2019</a></li> <li>● Forest Health and Adaption in Alberta Report 2021-2023</li> <li>● <a href="#">Forest Management Plans</a></li> <li>● <a href="#">Forest pest status update – aerial overview surveys 2021 – 2023</a></li> <li>● <a href="#">Forests Act</a></li> <li>● <a href="#">Predicted over winter mountain pine beetle mortality 2023-04-30</a></li> <li>● <a href="#">Timber Management Regulation</a></li> <li>● <a href="#">Weed Control Act</a></li> <li>● <a href="#">Wildfire Status dashboard</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>   |
| <p><b>2.2.12</b></p>            | <p><b>Genetically modified trees shall not be used.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b></p> <p>Provincial</p> <p><b>Analysis</b></p> <p>Diaz and Fridovich-Keil (2020) define a genetically modified organism (GMO) as an organism whose genome have been engineered in the laboratory to favour the expression of desired physiological traits or the generation of desired biological products. In conventional livestock production, crop farming, and even pet breeding, it has long been the practice to breed select individuals of a species to produce offspring that have desirable traits. Genetic modification, however, involves the use of recombinant genetic technologies to produce organisms whose genomes have been precisely altered at the molecular level, usually by the inclusion of genes from unrelated species of organisms</p>   |

that code for traits which would not be obtained easily through conventional selective breeding. GMOs have the potential to mix with the native gene pool leading to the creation and establishment of trees in forests and other natural landscapes that include modified genes in their genotypes. This would potentially disrupt the native gene pool.

The relevant federal and provincial legislation concerning the use of GMOs in forestry includes the following Acts and associated regulations.

### Federal

- Plant Protection Act
- Seeds Act

### Provincial

- Forests Act

### **Enforcement and monitoring**

The Canadian Food Inspection Agency regulates the environmental release of a plant with a novel trait. This mandate is provided by the federal Plant Protection Act and associated regulations and the Seeds Act and associated regulations. The Seeds Act Directive 94-08 – Assessment Criteria for Determining the Environmental Safety of Plants with Novel Traits – requires a stewardship plan be submitted as part of the application plan for plants with novel traits in unconfined locations. The Canadian Food Inspection Agency initiates enforcement measures when an unauthorized release occurs. There is strict scientific protocol set out in Directive 94-08 that needs to be conducted before a permit for commercialization. This protocol requires confined field trials to demonstrate safety. In Alberta, The Forests Act determines public policy for forest regeneration, but it does not reference the use of genetically modified seedlings in forest regeneration. However, under the Standards for Tree Improvement for Alberta (STIA) (2005) “in accordance with the Forest Genetics Council, GMOs are not approved for use in Alberta.” The Forests Act and the STIA do not apply to private land.

Alberta has a history of tree improvement and obtains guidance under Forest Health and Adaptation and the Alberta Forest Genetics Resource Council. The province operates several seed orchards producing genetically improved seed for reforestation on Crown land. They also operate a tree seed registry—Alberta Tree Improvement and Seed Centre—and stipulate parentage using a Controlled Parentage Program. The tree-breeding programs run by the provincial and federal governments do not involve any genetic engineering, gene insertion, gene splicing or biotechnology that results in genetically modified organisms.

Canadian Food Inspection Agency's oversight of plants with a novel traits covers both the unconfined environmental release of such plants and enforcement of unauthorized release. Canadian Food Inspection Agency will conduct a risk assessment of the use of the novel plant and if the novel traits include resistance to pests, herbicides or diseases, a stewardship plan is required. The Alberta Ministry of Forestry and Parks (MFP) provides oversight on seed production, breeding and usage through compliance and enforcement of the Forest Act. The Act and regulations govern how and where seed is deployed within the province. Alberta uses nine white spruce and six lodgepole pine breeding regions and a Controlled Parentage Program for seed production and distribution in the entire province. The seed regions establish the sources of parents for the seed orchard programs and the distribution of the resulting improved seed. This oversight ensures no GMO forest seed production.

As of 2022, genetically modified tree research trials are being conducted in Alberta, New Brunswick, Ontario and Quebec—these are typically small (i.e. approximately 2 ha). Spruce (*Picea* sp.) is the only species that has been identified as a candidate for genetic modification (Genome Canada). Alberta has a seed tree improvement program and tree seed registry. Alberta uses seed zones associated with seed orchard seed production to guide seed deployment. Use of the seed zones, seed registry for reforestation under regulation, and the policy of no GMO use ensures there is no commercial use of genetically modified tree species on Crown or private land within the province.

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|                                     | <p>Commercially available GMO forest tree stock is not being grown and not available in Alberta. There are no reports of any use of GMO seedlings in reforestation operations.</p> <p><b>Risk conclusion and justification</b></p> <p>There is a comprehensive federal and provincial regulatory framework, protocol requirements for implementation and government monitor programs controlling production and subsequent use of GMO. Results verified there is no production capacity for GMO seedlings and no commercial use of genetically modified tree species in Alberta. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p>   |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>● Regulatory framework</li> <li>● Regulatory agency websites</li> <li>● Forest management plans</li> <li>● Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>● Chain of custody procedures, including fibre tracking</li> <li>● Fibre procurement policy &amp; procedures</li> <li>● Regulatory compliance and enforcement data/reports</li> <li>● Oversight agency database records and/or reports</li> <li>● GMO protocols &amp; trial data</li> <li>● Regeneration assessments, applicable to the supply base area</li> <li>● Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> </ul>   |
| <p><i>Evidence reviewed</i></p>     | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Plant Protection Act and Regulations</a></li> <li>● <a href="#">Seeds Act and Regulations</a></li> <li>● <a href="#">Canadian Food Inspection Agency – FIA - Division 28 (Novel Foods) section of the Food and Drug Regulations C.R.C., c. 870.</a></li> <li>● <a href="#">Genome Canada</a></li> <li>● <a href="#">Natural Resources Canada – Research Projects – Research on the potential environmental impact of genetically modified trees</a></li> <li>● <a href="#">Questions and Answers: Revisions to Directive 94-08 – Assessment Criteria for Determining Environmental Safety of Plants with Novel Traits</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Alberta Forest and Research Council</a></li> <li>● <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>● <a href="#">Forest Health and Adaptation</a></li> <li>● <a href="#">Forests Act and Regulations</a></li> <li>● <a href="#">Standards for Tree Improvement in Alberta</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Diaz, Julia M and Judith L. Fridovich-Keil. 2020. Genetically modified organism.</a></li> </ul> |

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| <i>Risk rating</i> | Provincial <b>Low Risk</b> |
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**Principle 3 – Feedstock is only sourced from Supply Bases where the forest carbon stock is stable or increasing in the long term**

**Criterion 3.1 – Feedstock sourcing is consistent with international requirements for land use, land-use change and forestry (LULUCF) emissions**

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|--------------|--|
| <b>3.1.1</b> | <p><b>LULUCF emissions shall be accounted for through one of the following routes:</b></p> <p><b>Route A</b></p> <p>Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country’s commitment to reduce or limit greenhouse gas emissions, or</p> <p><b>Route B</b></p> <p>Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or</p> <p><b>Route C</b></p> <p>Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests’ capacity to act as a carbon sink is stable or increasing over the long term.</p> |
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| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>Land Use, Land Use Change, and Forestry (LULUCF) is one of the sectors countries are required to report on in annual national greenhouse gas (GHG) accounts to the United Nations Intergovernmental Panel on Climate Change (IPCC). Land use change driven by deforestation is a key source of global GHG emissions. Afforestation and restoration projects are being undertaken in many countries at scale, which will increase carbon stocks in the LULUCF sector. There are treaties and agreements at the international, national, regional and local levels, designed to reduce GHG emissions. The European Union’s Renewable Energy Directive 2018/2001 (REDII) of 11 December 2018 is applicable to biomass entering the European Union (EU) and requires tracking GHG emissions impacts associated with renewable energy. LULUCF is part of the REDII calculation. This Indicator is intended to ensure feedstock sourcing complies with REDII requirements for LULUCF emissions. In REDII, the overall EU target for renewable energy sources consumption by 2030 is 32%. REDII also includes a set of sustainability criteria that apply to biofuels, which include provisions with respect to land use change.</p> <p>Countries that do not track the GHG balance associated with the LULUCF sector do not know how much the sector is contributing to climate change, nor do these countries have the information required to determine an appropriate course of action to reduce emissions.</p> <p>Presently, the principal international treaty is the Paris Agreement, which is legally- binding. The agreement came into force in November 2016 and by 2020, signatories were required to provide Nationally Determined Contributions (NDCs) to reducing GHG emissions. NDCs include the GHG reduction levels the signatory intends to meet by 2030 and communicates the actions planned to meet the commitment.</p> <p><b>Enforcement and monitoring</b><br/>Countries have the choice of determining how to meet targets under the Paris Agreement and REDII. Countries have set targets in the NDC for 2030 and are required to report progress towards targets every two years. The NDCs are legally binding.</p> <p>Canada has outlined a variety of approaches as to how it will achieve its goal in its NDC. Canada’s NDC specifies the expected impacts of actions taken in the LULUCF sector, plus the proposed contributions from nature-based solutions and reductions in emissions.</p> <p>Countries meet regularly and report on progress against each country’s NDC. The biofuel sourcing criteria are enforced by customs agencies.</p> <p>This Indicator provides three routes for compliance. Route A is applicable to Canada and, by extension, to Alberta. Canada is a signatory to the Paris Agreement and provided its NDC in July 2021. The NDC sets out Canada’s GHG emission reduction goals, which incorporate the contribution of the LULUCF sector in national accounting systems and estimates future carbon stocks and emissions. Canada’s NDC sets a goal of reducing its 2030 emissions to 40-45% below the 2005 emissions level and reaching net zero by 2050. Because the NDC includes the impacts of changes in the LULUCF sector, Canada (and Alberta) meets the requirements of Route A in this Indicator.</p> <p><b>Risk conclusion and justification</b><br/>LULUCF emissions are accounted for through Route A and have been met at the national level by Canada. Based on evidence reviewed, this Indicator is designated as low risk for Alberta.</p> |
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| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Paris Agreement signatory</li> <li>• Nationally Determined Contributions for reduced GHG emissions targets and progress reports</li> </ul>  |
| <i>Evidence reviewed</i>     | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">RED II</a></li> <li>• <a href="#">The Paris Agreement</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Canada's 2021 Nationally Determined Contribution Under the Paris Agreement</a></li> </ul> |
| <i>Risk rating</i>           | Provincial <b>Low Risk</b>   |

### Criterion 3.2 – Carbon stocks in the forest area of the Supply Base are stable or increasing in the long term

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| <b>3.2.1</b>    | <p><b>All feedstock sourcing shall be consistent with either of these two options:</b></p> <p><b>Option A</b><br/>Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or</p> <p><b>Option B</b><br/>Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.</p>  |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>This Indicator requires an assessment of the trend in total forest carbon in the supply base. Forests store and sequester significant quantities of carbon above and below ground. Forest carbon is present in live forest biomass, dead biomass (dead twigs, branches, logs, and trees), leaf litter, and forest soil. These carbon pools are included in the assessment of carbon stock quantities. Models are able to simulate carbon stocks and flows between the various pools, as well as emissions into the atmosphere and sequestration of carbon. When losses of biomass exceed growth, there will be a decline in forest carbon stocks. Large scale and/or long-term natural disturbances such as wildfire and/or insect outbreaks may cause significant losses of forest carbon stocks. Forests experiencing declining forest carbon stocks are net emitters of greenhouse gases (GHG) and are contributing to climate change. In Alberta, there are no specific regulatory requirements that forests must be managed to maintain or increase carbon stocks.</p> <p><b>Enforcement and monitoring</b><br/>The federal Environment and Climate Change Canada is required to prepare an annual GHG inventory report, National Inventory Report: Greenhouse Gas Sources</p> |

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and Sinks in Canada, to meet its international obligations under the United Nations Framework Convention on Climate Change. Natural Resources Canada (NRCAN) uses the Carbon Budget Model to prepare the forest-related components of the National Inventory Report providing estimates of carbon emissions, removals, and other fluxes for the Canadian forest sector.

NRCAN's Carbon Budget Model simulates changes in forest carbon stocks in Canadian forests. The Carbon Budget Model uses provincial forest inventory data and provincial growth and yield data. Data for disturbances such as wildfire, major insect infestations, harvest, and deforestation are sourced from both federal (e.g., wildfire) and provincial (e.g., insect) mapping initiatives. The Carbon Budget Model provides data on the carbon stocks in live and dead biomass (above and below ground), litter layer, and soil, collectively termed total ecosystem carbon. Total forest ecosystem carbon is the result of growth, natural disturbances, harvesting, deforestation, and afforestation, as well as impacts due to changes within the carbon pools (e.g., emissions from decay of the dead wood). NRCAN's methodology is supported by more than 100 peer reviewed scientific papers that describe aspects of the methodology, data used, parameterization, and use of model outputs. NRCAN provides oversight and monitors forest carbon stocks, GHG emissions, and other fluxes on a national basis and has the capability of compiling provincial assessments. The Alberta Ministry of Forestry and Parks provides data but does not provide formal oversight of the process.

NRCAN's Carbon Budget Model results showed Alberta's total forest ecosystem carbon stocks declined by 76 million tonnes of carbon between 2017 and 2021. This represents a 1.1% net reduction in total forest ecosystem carbon stocks. During this five-year period, harvesting remained steady.

The Carbon Budget Model calculated a reduction of 35 million tonnes of carbon due to harvesting during the period. Deforestation is roughly estimated to have contributed a further seven million tonnes of carbon to the reduction in the total forest ecosystem carbon. The Carbon Budget Model calculated the losses of carbon due to natural disturbances, which amounted to almost 36 million tonnes of carbon between 2017 and 2021. The natural disturbance emissions reported by the Carbon Budget Model are the emissions that occurred in the year of the disturbance, and these are a contributing factor to the change in total forest ecosystem carbon.

In the mid-late 1990s, a defoliator outbreak caused widespread partial and total mortality of poplar. In the early 2000s, a spruce budworm outbreak caused a substantial amount of mortality. Alberta has also experienced a major mountain pine beetle outbreak, which was severe between 2006 and 2018 in terms of extent and mortality. These infestations created large volumes of dead organic matter, which has been and continues to decay, causing GHG emissions. Between 2017 and 2021, the carbon stock decline from dead organic matter pool amounted to 40 million tonnes of carbon, which is attributable to past natural disturbance. Between 2017 and 2021, the losses due to current natural disturbance (36 million tonnes of carbon) and past natural disturbance (40 million tonnes of carbon) equal the reduction in total forest ecosystem carbon. Past and present natural disturbance accounted for the full decline in total forest ecosystem carbon. In the absence of natural disturbances, Alberta's carbon stocks would be unchanged between 2017 and 2021. The Carbon Budget Model results are incorporated into the National Inventory Report 1990-2021: Greenhouse Gas Sources and Sinks in Canada 2023 produced by Environment and Climate Change Canada.

As of March 2024, carbon stock change associated with 2022 and 2023 disturbances is not yet been published in the National Inventory Report.

### **Risk conclusion and justification**

The NRCAN data showed the provincial forest carbon stocks have declined slightly between 2017 and 2021. During this period, the loss of carbon due to natural disturbances has driven the decline in total ecosystem carbon. Based on evidence reviewed, Alberta meets the criteria in Option B of the Indicator and is designated as low risk at the provincial level.

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |   |
|------------------------------|---|
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Carbon stock analysis, accounting for natural disturbance, applicable to the supply base</li> <li>• Permanent sample plot data, applicable to the supply base</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Supplier verification program</li> <li>• Supplier transportation documentation (origin &amp; species)</li> <li>• Interview with suppliers</li> </ul>  |
| <i>Evidence reviewed</i>     | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Canada's National Inventory Report (NIR): Greenhouse Gas Sources and Sinks in Canada</a></li> <li>• Natural Resources Canada (NRCan). 2024. Forest carbon stocks calculated by the Carbon Budget Model.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta's Climate Leadership Plan</a></li> <li>• <a href="#">Emissions Management and Climate Resilience Act</a></li> <li>• <a href="#">Emissions Reduction and Energy Development Plan</a></li> <li>• <a href="#">July 10, 2023 Mandate Letter for the Minister of Environment and Protected Areas</a></li> </ul>  |
| <i>Risk rating</i>           | Provincial <b>Low Risk</b>  |
| <b>3.2.2</b>                 | <b>Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.</b>   |
| <i>Findings</i>              | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>Primary feedstock is fibre delivered directly from the forest to a wood pellet facility. Typically, this includes low-grade roundwood, logging slash, and ground or chipped material. This Indicator only pertains to the sourcing of primary feedstock. Processing residue feedstock (mill residuals) and post-consumer feedstock are excluded from the requirements of this Indicator. The Indicator is intended to ensure primary feedstock is not sourced from the least productive forest sites, which usually support slow-growing forests.</p> <p>In Alberta, such sites could include bogs, fens, and other peatlands, as well as forests growing on thin or poor soils or with other site characteristics that inhibit tree growth. Many such forests would be considered inoperable and would not be part of the forest that contributes to the long-term sustainable harvest levels. See Indicator 2.2.9 – Long-Term Production Capacity, for more details on long-term production capacity. The Indicator also stipulates that primary feedstock will not be sourced from sites that are difficult to regenerate. See Indicator 2.2.10 – Regen After Harvest, for more details on regeneration.</p> |

## Annex 1 Detailed findings for Supply Base Evaluation

Harvesting from slow-growing forests result in an extended time before the renewed stand accumulates sufficient carbon stocks to replace those removed. Similarly, harvesting from forests that are difficult to regenerate results in uncertain renewal prospects and therefore uncertain future carbon stocks.

Crown Land

- Forests Act
- Forest Act, Timber Management Regulation Private Land

There is no regulatory framework to prevent harvesting sites with low productivity or difficult to regenerate on private land.

### **Enforcement and monitoring**

Crown Land

The Alberta Ministry of Forests and Parks (MFP) has authority to administer the Forests Act. The Forests Act provides the regulatory framework for long-term sustainable harvest levels, which includes identification of low productive sites and requirements for post-harvest regeneration on Crown land. Alberta's Forest Management Planning Standard describes the partitioning of the land base during forest planning. The Standard requires the forested land base be classed as either active (or contributing) or passive (non-contributing). The passive land base is not available for harvest and does not contribute to the determination of the Annual Allowable Cut (AAC). The Standard states the timber disposition holders must identify inoperable area and assign this area to the passive land base. The timber disposition holders may identify area and assign to the passive land base that is a combination of species, low volumes, and/or poor site productivity. Sites of low productivity are correlated with sites that have renewal challenges. Timber disposition holders prepare Forest Management Plans (FMPs), General Development Plans (GDPs) and Annual Operating Plans (AOPs) which account for sites of low productivity and difficult to regenerate.

Private Land

As of March 2024, there is no publicly available information describing implementation mechanisms that avoids timber harvesting from low productivity or difficult to regenerate sites on private land.

Crown Land

MFP review and approve FMPs, GDPs and AOPs. MFP monitor harvesting activities, including successful regeneration through the Forest Operations Monitoring Program (FOMP).

Private Land

Owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework that confirms timber harvesting avoids low productivity or difficult to regenerate sites on private land.

Crown Land

Alberta's forest management framework enables timber disposition holders to remove lands with low site productivity from the portion of the landbase that contributes to the annual allowable harvest. Operations cannot occur without approved FMPs, GDPs and AOPs from MFP. Low-productivity sites, and sites that are difficult to regenerate are assigned to the non-contributing landbase, which unavailable for harvesting. MFP FOMP data showed regeneration compliance was 86% for 2021/22 and 82% for 2022/23.

Private Land

As of March 2024, there are no publicly available results to verify that timber harvesting avoids sites of low productivity or difficult to regenerate on private land

### **Risk conclusion and justification**

## Annex 1 Detailed findings for Supply Base Evaluation

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|                                     | <p><u>Crown Land</u><br/>There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data, excluding low-productivity sites. FOMP data verifies compliance with regeneration. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.</p> <p><u>Private Land</u><br/>Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification of low-productive or difficult to regenerate sites as well as the avoidance of timber harvesting from these sites, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in Alberta.</p>                                      |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Maps/data of low productive sites, applicable to the supply base</li> <li>• Records of regeneration failures, applicable to the supply base</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Supplier transportation documentation (origin &amp; species)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with experts</li> </ul> |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard. Version 4.1, (2006)</a></li> <li>• MFP, average active/passive landbase ratio, January 31, 2024</li> </ul>  |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

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|------------------------|--|
| <p><b>3.2.3</b></p>    | <p><b>Primary feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).</b></p>  |
| <p><i>Findings</i></p> | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>Primary feedstock is fibre delivered directly from the forest to a wood pellet facility. Typically, this includes low-grade roundwood, logging slash, and ground, or chipped material. This Indicator only pertains to the sourcing of primary feedstock. Processing residues feedstock (mill residuals) and post-consumer feedstock are excluded from the requirements of this Indicator.</p> <p>SBP's Standard 1 Guidance document indicates "high carbon stock forests as forests that have significant amounts of carbon stored in their above-ground biomass, belowground biomass, and soil. The exact threshold for what constitutes a high carbon stock forest will vary depending on the context. Forests that stand at the top 10% of the volume per ha in the region, with adjustment to reflect normal range for species or mix, would normally be considered 'high carbon' and warrant further examination and justification." The European Union (EU) indicates "high carbon stocks to be in wetlands, peatlands and forests (EU RED II, EU Glossary Item: "Land with high carbon stock"). In the context of forest ecosystems, mature and old-growth forests have the highest carbon stocks, and are also important for biodiversity, especially those with a higher degree of naturalness" (e.g. Molina-Valero et al. 2021, Kēniņa et al. 2019, Nord-Larsen et al. 2019, Seedre et al. 2015, Luysaert et al. 2008).</p> <p>SBP's Standard 1 Guidance document indicates "high conservation value forests are forests that are considered to be of exceptional ecological, social, or cultural value. These forests may contain rare or threatened species, provide critical ecosystem services, or support the livelihoods and cultural practices of indigenous or local communities. The definition of high conservation value forests is often context-specific and may vary depending on the location and the stakeholders involved."</p> <p>High conservation value forests were evaluated thoroughly in Indicators 2,1,1 Key Eco/HCV Identified, 2.1.2 Key Eco/HCV Threats ID and Eval, and 2.1.3 Key Eco/HCV Maintained or Enhanced. For those Indicators, the HCV proxies used were:</p> <ul style="list-style-type: none"> <li>• Landscape-level: wide ranging species-at-risk, large landscape, and Intact Forest Landscapes.</li> <li>• Stand-level: small home range species-at-risk, rare, threatened and endangered ecosystems, and key habitat attributes, including old forests.</li> </ul> <p>Indicator 3.2.1 Forest Carbon Stocks Stable or Increasing assessed carbon stock a trend of the total forest carbon in the supply base, but did not delineate and/or classify or identify specific high carbon stocks. A proxy for high carbon stocks in the forests of Canada are forests at the maximum of carbon sequestration in standing fibre (e.g., top 10% of inventoried volume per hectare). In the absence of inventoried volume per hectare these would in most cases be the oldest and densest forests (top 10% as a target). In addition, these forests typically have a high concentration of biodiversity values.</p> <p>This Indicator is intended to ensure primary feedstock is not sourced from forests that have combined attributes of high levels of carbon stocks and high conservation values. The areas where these proxies (high carbon and HCV) overlap are focus of Indicator 3.2.3 No Primary Feedstock from HCS &amp; HCV. Sourcing primary feedstock from forests with the combined attributes of high carbon stocks and high conservation values (as defined above) will reduce the carbon stocks and conservation values present. As well, the forest that regrows is unlikely to reach the same levels of carbon stocks, leading to a net emission of carbon into the atmosphere when these stands are harvested.</p> <p><u>Crown Land &amp; Private Land</u></p> |

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There is no regulatory framework, provincial policy or planning direction specific to high carbon stock forests. The regulatory framework regarding high conservation values was described in the assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced. There is no regulatory framework to prevent harvesting forests with the combined attributes of high carbon stocks and high conservation values on Crown land and other private land.

### **Enforcement and monitoring**

#### Crown Land & Private Land

As there is no regulatory framework, provincial policy or planning direction specific to high carbon stock forests, there is no publicly available information describing the implementation mechanisms for the management of high carbon stocks on Crown land and private land. The implementation mechanisms for high conservation values were described in the assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown land and other private land.

As of March 2024, there is no publicly available information describing an oversight and/or monitoring framework to prevent harvesting forests with the combined attributes of Crown Land & Private Land

As there is no regulatory framework, provincial policy or planning direction regarding stands with high carbon stocks, there is no publicly available information describing the oversight and/or monitoring framework specific to the management of high carbon stocks on Crown land and private land. The oversight and/or monitoring framework for high conservation values were described in the assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown land and private land. As of March 2024, there is no publicly available information describing an oversight and/or monitoring framework to prevent harvesting forests with the combined attributes of high carbon stocks and high conservation values on Crown land and private land. high carbon stocks and high conservation values on Crown land and private land.

#### Crown Land & Private Land

As of March 2024, there is no publicly available results to verify that harvesting of primary feedstock is not sourced from forests that have combined attributes of high levels of carbon stocks and high conservation values on Crown land or private land. The assessment of Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced concluded that for biodiversity values specific to high conservation value forests (i.e., key habitat attributes and species at risk, including old forests) are a focal point and that uncertainty as to the maintenance of some biodiversity values was determined, resulting in specified risk for that Indicator on Crown land or private land.

### **Risk conclusion and justification**

#### Crown Land & Private Land

The federal and provincial regulatory framework governing the management and maintenance of biodiversity values is extensive (Details provided in Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced). There is no regulatory framework specific to the management of high carbon stocks.

A specified risk designation was applied to Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced for Crown land, and private land. Additionally, there is a lack of evidence to support implementation mechanisms, an oversight/monitoring framework, and/or results to verify the identification and the subsequent avoidance of harvesting of primary feedstock from forests that have combined attributes of high carbon stocks and high conservation values on Crown land and private land. Given the lack of evidence, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land and private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

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|------------------------------|---|
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Carbon stock analysis, applicable to the supply base and specific to high carbon stocks</li> <li>• High carbon stocks and high conservation values intersect analysis</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Maps/data of high carbon stocks, applicable to the supply base</li> <li>• Maps/data of high conservation value, applicable to the supply base</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with experts</li> </ul> |
| <i>Evidence reviewed</i>     | <p>See:</p> <ul style="list-style-type: none"> <li>• Indicator 2.1.3 Key Eco/HCV Maintained or Enhanced</li> </ul>  |
| <i>Risk rating</i>           | <p>Crown Land <b>Specified risk</b></p> <p>Private Land <b>Specified risk</b></p>   |

### Criterion 3.3 – Feedstock sourcing shall not compete with wood sourcing for long-lived wood products

|                 |  |
|-----------------|--|
| <b>3.3.1</b>    | <p><b>Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.</b></p>   |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>Under the European Union Renewable Energy Directive 2018/2001 (REDII), considers long-term to be at least 30 years (Navigant Netherlands et al 2021). The Intergovernmental Panel on Climate Change (IPCC) Good Practice Guidance for Land Use Land Use Change and Forests (2003) provides default half-lives for forest products: sawnwood (i.e., lumber) is 35 years, and for veneer, plywood and structural panels it is 30 years. Non-structural panels have a half-life of 20 years. Using these data as a basis for describing how to assess this Indicator suggests long-lived forest products include veneer, lumber, plywood, and other structural panels. Long-lived forest products</p> |

## Annex 1 Detailed findings for Supply Base Evaluation

store carbon and can keep it out of the atmosphere for extended periods of time. In this context, high-quality stem wood includes sawlogs, veneer bolts, and logs that are suitable for oriented strand board production. When processing natural resources, the highest quality raw material is typically used to produce the highest quality products, which are usually higher value. High-quality raw material could also be used to produce lower-valued products whereas a low-valued raw material cannot produce a high-valued product. The principle of cascading use is that the highest quality raw material is used to produce the highest valued products it is capable of being made into. As the raw material descends the quality scale, the quality of the products it can be made into diminishes. The circular bioeconomy publication of the World Business Council of Sustainable Development defines the principle of cascading use as maximising "resource effectiveness by using biomass in products that create the most economic value over multiple lifetimes."

This Indicator is intended to ensure feedstock procurement is not contributing to greenhouse gas (GHG) emissions by diverting high-quality stem wood away from the production of long-lived forest products.

If feedstock procurement is diverting high-quality stem wood away from the production of long-lived forest products, it will be contributing to GHG emissions. It may also negatively affect the viability of the mills that produce long-lived forest products.

In Alberta, there are no specific regulatory requirements that stem wood, or timber in general, must go to its highest and best end-use, or preferentially towards the production of long-lived forest products.

### **Enforcement and monitoring**

Alberta's forest products industry is highly integrated. Under all licence types, the licence holders have rights to harvest timber. Primary licensee will typically use part of the timber allocation for its mills and then sell or trade the remaining components of the harvest to other forest products companies. Producers of long-lived forest products, especially lumber and other solid wood products, are co-dependent with pulp mills and pellet mills. Many pulp mills and all pellet mills depend on by-products from sawmills for a substantial part of feedstock supply. These arrangements are underpinned by the nature and importance of the co-dependency relationship as well as by pricing for different forest products. In practice, this means other than the allocations of timber rights in provincial licences, timber flows are governed by business-to-business agreements and market pricing. Integrated forest products companies are highly incentivised by profit to use veneer bolts and sawlogs (i.e., high-quality stem wood) for plywood and lumber/stud production, respectively. Similarly, harvest contractors have every incentive to maximise the revenue for the timber harvested. This means veneer bolts, which are the highest quality and most expensive logs, are sold to plywood plants rather than sawmills. Sawlogs, which are one level lower on the quality and price scale, go to sawmills.

There is no oversight framework in place specific to the principles of cascading as there are no relevant requirements or policies.

MFP publishes a regular report on Alberta's forest economy—Alberta's Forest Economy: A Handbook of Public Economic and Socioeconomic Accounts. The most recent report (2023) states that the 2020 annual allowable cut (AAC) was 29.6 million m<sup>3</sup> and 26.3 million m<sup>3</sup> was harvested, representing 89% of the AAC. The publication also reported almost 100% of the conifer harvest was logs and bolts (i.e., high-quality stem wood), with none going as pulpwood. Roughly 1/3 of the deciduous harvest was logs and bolts (i.e., high-quality stem wood), almost all of which was used by oriented strand board plants. The remaining 2/3 was largely used as pulpwood. This indicates all the high-quality coniferous stem wood was first processed into high-valued long-lived forest products. The cascading principle operates less consistently with respect to hardwoods because there is an abundant supply—roughly 1/3 of the Crown hardwood AAC is uncut and pulp mills use wood that would be suitable for oriented strand board.

Alberta has relatively few product categories for stumpage rates. There is a single rate for coniferous lumber, pulp and roundwood and separate rates for oriented strand board and deciduous pulpwood. The rates are adjusted monthly based on the underlying product prices. For example, in 2021 and 2022, the stumpage rate

## Annex 1 Detailed findings for Supply Base Evaluation

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|------------------------------|---|
|                              | <p>for deciduous pulpwood has been both higher and lower than the rate for oriented strand board bolts.</p> <p><b>Risk conclusion and justification</b></p> <p>The 2023 industry economic profile indicated all coniferous high quality stem wood went to long-lived forest products manufacturers. A large amount of the deciduous harvest was used for oriented strand board production. Other than the uses supported by the licencing system, there are no orders that direct stem wood (regardless of quality) to specific uses and mills. Companies generally have fibre exchange agreements to minimise fibre cost while meeting quality standards. The evidence indicates that market drivers are in place to induce high-quality stem wood to be sent to its highest valued use, which is associated with long-lived forest products. The pellet facilities in Alberta are largely dependent on residues produced by sawmills. This sourcing pattern, as well as the harvest data presented above, is consistent with the principles of product cascading. Based on the evidence reviewed, this Indicator is designated as low risk at the provincial level for Alberta.</p> |
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Chain of custody procedures, including fibre tracking</li> <li>• Fibre procurement policy &amp; procedures</li> <li>• Supplier transportation documentation (origin &amp; species)</li> <li>• SBP supply base reports &amp; SBP audit reports</li> </ul>   |
| <i>Evidence reviewed</i>     | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Intergovernmental Panel on Climate Change (IPCC). 2003. Good Practice guidance for Land Use Land Use Change and Forests. Appendix 3a.1. Harvested wood products: basis for future methodological development.</a></li> <li>• <a href="#">Navigant Netherlands B.V., The European Forest Institute, The Institute for European Environmental Policy, and Oeko-Institut. 2021. Technical Assistance for the Preparation of Guidance for the Implementation of the New Bioenergy Sustainability Criteria Set Out in the Revised Renewable Energy Directive. REDIIIBIO final report. February 2021.</a></li> <li>• <a href="#">World Business Council on Sustainable Development (WBCSD) Circular bioeconomy: The Business Opportunity Contributing to a Sustainable World.</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Agriculture, Forestry and Rural Development. 2022. Alberta's forest economy – A handbook of public economic and socio-economic accounts.</a></li> <li>• <a href="#">Alberta government Stumpage prices</a></li> </ul>   |
| <i>Risk rating</i>           | Provincial <b>Low Risk</b>  |

**Principle 4 – Feedstock sourcing benefits people and communities**

**Criterion 4.1 – Decent working conditions are provided, and labour rights are safeguarded**

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|------------------------|--|
| <p><b>4.1.1</b></p>    | <p><b>Freedom of association and the right to collective bargaining shall be respected in the workplace.</b></p>   |
| <p><i>Findings</i></p> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>Freedom of association refers to the right to join others for a legal common cause without interference. It is an individual’s right to join with other individuals and collectively express, promote, pursue, and defend common interests. The International Labour Organization (ILO) places freedom of association “at the core of the organization ILO’s values” and considers it to be a fundamental human right. The ILO continues by saying that “the right of workers and employers to form and join organizations of their own choosing is an integral part of a free and open society. Independent employers’ and workers’ organizations provide clear partners for collective bargaining and social dialogue and in many cases, they have played a significant role in their countries’ democratic transformation.” The ILO defines the term collective bargaining as “all negotiations which take place between an employer, a group of employers or one or more employers’ organisations, on the one hand, and one or more workers’ organisations, on the other, for: (a) determining working conditions and terms of employment; and/or (b) regulating relations between employers and workers; and/or (c) regulating relations between employers or their organisations and a workers’ organisation or workers’ organisations.” Issues of dispute resolution related to freedom of association and the right to collective bargaining are discussed in Indicator 4.1.9 Workplace Grievance Mechanisms - Workplace. Where freedom of association and the right to collective bargaining are restricted or absent, the potential exists for employers to force workers to work in unfair or unsafe situations. A restricted or absent freedom of association and/or right to collective bargaining results in a power imbalance between employees and employers, which reduces the likelihood of a fair wage, reasonable working conditions, and fair treatment. For companies, there is also an increased potential for work stoppages.</p> <p>The United Nations Universal Declaration on Human Rights, of which Canada is a signatory, recognises the right to freedom of association in Article 20.</p> <p>Canada is signatory to the two ILO conventions that concern freedom of association and collective bargaining. Convention C087–Freedom of Association and Protection of the Right to Organize Convention (1948, ratified 1972) is in force. Convention C098–Right to Organize and Collective Bargaining Convention (1949), was ratified by Canada on 14 June 2017, and came in force one year later.</p> <p>The Canadian Charter of Rights and Freedoms explicitly states that everyone has the freedom of association. The Charter applies throughout Canada and overrides any inconsistent provincial legislation. The Charter’s freedom of association protects three classes of activities:</p> <ol style="list-style-type: none"> <li>(1) The constitutive right to join with others and form associations;</li> <li>(2) The derivative right to join with others in the pursuit of other constitutional rights; and</li> <li>(3) The purposive right to join with others to meet on more equal terms the power and strength of other groups or entities.</li> </ol> <p>The Supreme Court of Canada has recognised the right to collective bargaining as a component of freedom of association. Freedom of association is protected provincially in Alberta under the Alberta Labour Relations Code. The Code governs rights, duties, and unfair labour practices; collective bargaining; and strikes,</p> |

lockouts, and picketing.

### **Enforcement and monitoring**

The United Nations (UN) Universal Declaration of Human Rights, Article 20 on Freedom of Association is implemented by the Human Rights Council. The UN provides technical advice, tools, and guidance to all stakeholders on measures needed to facilitate and protect freedom of association. Additionally, the UN's work involves advising on the enabling environment and legal framework needed for the operation of associations.

The ILO regularly promotes freedom of association and the right to collective bargaining—from advising governments on labour legislation—to providing education and training for trade unions and employer groups. The ILO Committee on Freedom of Association hears complaints regarding freedom of association.

Freedom of association is protected under the Canadian Charter of Rights and Freedoms but is implemented at the provincial level. The Alberta Labour Relations Code, implemented by the Ministry of Jobs, Economy and Trade, establishes the Alberta Labour Relations Board which acts as an independent and impartial tribunal on issues related to labour in the province. The Board actively oversees certification, revocation, strike or lockout applications, and supervises the various votes authorised by the Code. Additionally, the Board actively encourages dispute resolution, employs officers in investigations, and makes major policy decisions. The Board is available to support all parties (trade unions, employers, and employees). The Government of Alberta, Mediation Services also provides labour mediation, as required by legislation, in advance to disputes being dealt with by the Alberta Labour Relations Board. Trade unions are active in pursuing collective agreements within the province.

The UN has appointed a Special Rapporteur on the rights to freedom of peaceful assembly and of association and monitors discrimination globally through the Special Procedures of the Human Rights Council. The UN conducts investigations regarding alleged violations of human rights, including the freedom of association and the right to collective bargaining.

The ILO has a procedure that allows a complaint to be filed against a member state for not complying with a ratified convention. Complaints are investigated with the action dependent upon the particulars of the case. Several international organisations, including the ILO, track labour statistics and conditions, and publish country assessments and rankings. These could be used as a basis for the ILO to sanction Canada for non-conformance with ILO requirements. The ILO regularly examines the application of standards in member states and points out areas where standards could be better applied.

The International Trade Union Confederation (ITUC) Global Rights Index assess and report publicly on the status of the freedom of association and the right to collective bargaining in countries around the world. Statistics Canada reports the number of unionised versus non-unionised workers by industry and province. The Canadian Foundation for Labour Rights reports on legislation which restricts freedom of association.

The Alberta Labour Relations Board oversees all matters involving the Alberta Labour Relations Code. Complaints can be brought forward to the Board by unions, employers, or employees. Contact information for the Board and a description of the process are made publicly available through the Board's website. There are several mechanisms in place to resolve grievances and disputes. Collective agreements are publicly available on the Board's website. The Alberta Labour Relations Board self-reports on outcomes publicly and publishes all decisions on the Board's website and the Canadian Legal Information Institute website.

As of September 2023, the UN has initiated 37 investigative inquiries globally; none were in Canada. ILO Commission of Inquires are taken against countries, not regions or companies. Commissions are only initiated when a country has persistent and serious violations. As of September 2023, only 14 Commissions have been convened, none of which were against Canada. Outcomes of Commissions are publicly available.

The ILO Committee on Freedom of Association investigates complaints regarding freedom of association. None of the cases investigated by the ILO in the decade previous to September 2023 are related to either Alberta or forestry.

The ITUC Global Rights Index ranks countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in

## Annex 1 Detailed findings for Supply Base Evaluation

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|                                     | <p>practice. The 2023 ITUC Global Rights Index assigned Canada a rating of three, where a score of one is exemplary and a score of five indicates poor conditions for labour. The report specifically notes "In Canada, trade unions registered significant numbers of cases of employers engaging in bad faith collective bargaining."</p> <p>Statistics Canada reports, as of September 2023, that Alberta has a rate of unionisation within the natural resource sector (forestry, fishing, mining, quarrying, oil &amp; gas) of 9.7% of workers unionised. A review of the Canadian Foundation for Labour Rights' website indicates that there has been one concern raised with legislation that restricts the freedom of association in Alberta that would affect forestry in the last decade (Sept 2013 - Sept 2023). An internet review conducted in September 2023 indicates unionisation of facilities is ongoing in Alberta and does not indicate any specific concerns with regards to freedom of association and the right to collective bargaining in the forest industry in Alberta.</p> <p><b>Risk conclusion and justification</b></p> <p>There is a strong regulatory framework to protect freedom of association and the right to collective bargaining; there is a culture of awareness of the freedom to associate and the right to collective bargaining; and there is no evidence of recent efforts to curtail either freedom of association or collective bargaining in the forest sector. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Collective bargaining agreements</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>   |

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| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• International Labour Organization. <a href="#">Freedom of Association</a>.</li> <li>• International Labour Organization. <a href="#">What is collective bargaining</a>.</li> <li>• International Labour Organization. <a href="#">Ratifications for Canada</a>.</li> <li>• International Labour Organization. <a href="#">International Labour Standards on Freedom of Association</a>.</li> <li>• International Labour Organization. <a href="#">International Labour Standards on Collective Bargaining</a>.</li> <li>• International Labour Organization. <a href="#">How the ILO Works</a>.</li> <li>• International Labour Organization. <a href="#">Complaints</a>.</li> <li>• International Labour Organization. <a href="#">Committee on Freedom of Association</a>.</li> <li>• International Labour Organization. <a href="#">Canada Freedom of association cases</a>.</li> <li>• United Nations. <a href="#">Universal Declaration of Human Rights</a>. December 1948.</li> <li>• United Nations. <a href="#">Freedom of assembly and association</a>.</li> <li>• United Nations. <a href="#">Special Rapporteur on freedom of peaceful assembly</a>.</li> <li>• United Nations. <a href="#">Human Rights Council-mandated Investigative Bodies</a>.</li> <li>• International Trade Union Confederation. <a href="#">2023 Global Rights Index</a>. 2023</li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Government of Canada. <a href="#">Section 2(d) Freedom of Association</a>.</li> <li>• Statistics Canada. <a href="#">Union coverage by industry, monthly, unadjusted for seasonality</a>.</li> <li>• Canadian Foundation of Labour Rights. <a href="#">Restrictive Laws</a>.</li> <li>• Canadian Legal Information Institute. <a href="#">Homepage</a>.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Labour Relations Code</a>.</li> <li>• Alberta Labour Relation Board. <a href="#">Homepage</a>.</li> <li>• <a href="#">A Guide to Alberta's Labour Relations Laws</a>. Revised March 2021.</li> <li>• Government of Alberta. <a href="#">Database of Collective Agreements</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Annual Reports</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Decisions</a>.</li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>  |

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| 4.1.2    | <b>Forced or compulsory labour shall not be used.</b>  |
| Findings | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>Compulsory labour, also referred to as forced labour, was defined by the International Labour Organization (ILO) in the 1930 Forced Labour Convention as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” It refers to situations in which persons are coerced to work using violence or intimidation or by more subtle means such as manipulated debt, retention of identity papers, or threats of denunciation to immigration authorities.</p> <p>The ability of an individual to choose where he or she is willing to work and to decline unsafe work is an important right in a just society and is also important for the well-being of the individual. In a compulsory labour situation, salary, benefits, property, or documents may be withheld to force workers to continue working. Workers may also be forced to pay fees for employment, equipment, food and/or lodging.</p> <p>The United Nations (UN) Universal Declaration on Human Rights, of which Canada is a signatory, states the “No one shall be held in slavery or servitude” in Article 4. Canada is signatory to two relevant ILO Conventions: C029–Forced Labour Convention (1930, ratified 2011) and C105–Abolition of Forced Labour Convention (1957, ratified 1959). There are six offences that address human trafficking in the Canadian Criminal Code. The Code is administered by the Attorney General of Canada. Additionally, human trafficking is an offense under section 118 of the Immigration and Refugee Protection Act, overseen by Immigration, Refugee and Citizenship Canada.</p> <p>The Alberta Ministry of Jobs, Economy and Trade (MJET) regulates employment in the province, including the forest industry. The Alberta Employment Standards Code sets standards for paying earnings, employment records, hours of work, overtime work and overtime pay, general holidays and pay, vacations and pay, as well as various forms of leave. Section 4 of the Code specifies that the minimum standards set out in the Code cannot be avoided. The Employment Standards Code does not mention compulsory labour however it contains other provisions intended to ensure that employees are not overworked.</p> <p><b>Enforcement and monitoring</b><br/>The UN Universal Declaration of Human Rights, Article 4 on the prohibition of slavery and servitude is implemented by the Human Rights Council. The UN requests, receives and exchanges information on forced labour and recommends action and measures applicable at the nation, regional and international levels to eliminate forced labour practices. The ILO has launched a global Fair Recruitment Initiative to: (i) help prevent human trafficking; (ii) protect the rights of workers, including migrant workers, from abusive and fraudulent practices during the recruitment and placement process. The ILO also engages in education and implementation of country- based initiatives. There is a national Human Traffic Coordination Centre to support the provincial agencies in combatting human trafficking through activities such as training and establishing a national database of traffickers. The Criminal Code of Canada is nationally applicable and is implemented in Alberta through the Ministry of Justice. The Ministry of Justice prosecutes crimes and shares information relative to legal issues.</p> <p>MJET implements the Alberta Employment Standards Code by maintaining a publicly available website of employment standards and deals with problems which arise with the application of the Code. Where a collective agreement exists, trade unions would work closely with employers and employees to ensure the requirements of the Code or collective agreement is fully implemented.</p> <p>The UN has appointed a Special Rapporteur on contemporary forms of slavery which monitors forced labour globally. The United Nations conducts investigations</p> |

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|                                     | <p>regarding alleged violations of human rights, including forced labour. The ILO has a procedure that allows a complaint to be filed against a member state for not complying with a ratified convention. Complaints are investigated with the action dependent upon the particulars of the case. Several international organisations, including the ILO, track labour statistics and conditions and publish country assessments and rankings. These could be used as a basis for the ILO to sanction Canada for non-conformance with ILO requirements. The ILO regularly examines the application of standards in member states and points out areas where standards could be better applied.</p> <p>The Criminal Code is enforced throughout Canada by police and the judicial system. The federal government has taken measures to suppress forced labour, including setting up a special team within the Royal Canadian Mounted Police (RCMP) to combat trafficking and sexual exploitation. There is a federal human trafficking hotline available.</p> <p>As of September 2023 the UN has initiated 37 investigative inquiries globally; none were in Canada. ILO Commissions of Inquiry are taken against countries, not regions or companies. Commissions are initiated only when a country has persistent and serious violations. As of September 2023, only 14 Commissions have been convened, none of which were against Canada. Outcomes of Commissions are publicly available. Although forced labour is a significant global problem, it is relatively uncommon in Canada. According to the Global Slavery Index, in 2018, Canada ranked 26 out of 181 evaluated countries in the World (1 being the best) with an estimated 0.018% population in modern slavery. Canada has one of the lowest estimated prevalence of modern slavery by population proportion. The top ranked countries generally have more economic wealth, score higher on government response, have low levels of conflict, and are politically stable with a willingness to combat modern slavery.</p> <p>Between 2010 and 2020, police services in Canada reported nearly 3,000 instances of human trafficking. Nearly all of those instances (86%) were in metropolitan areas and not related to the forest industry. The Alberta Labour Relations Board receives and resolves hundreds of grievances annually. In 2022/23 Case Resolution by Category Report (the last report available as of September 2023), the Board reported having 16 open employment standards appeals cases at the beginning of the annual period, receiving 48 and concluding 48. No additional results at the provincial level for this Indicator were found.</p> <p>An internet review conducted in September 2023 did not indicate there were any specific concerns with compulsory labour within the Alberta forest industry.</p> <p><b>Risk conclusion and justification</b></p> <p>While human trafficking is a risk in all industries globally, Canada’s combined legislative regime, high level of economic wealth, low level of conflict, and high level of political stability results in a lower risk of human trafficking occurring.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Workforce/employment records</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>   |

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| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• United Nations. <a href="#">Universal Declaration of Human Rights</a>. 10 December 1948.</li> <li>• United Nations. <a href="#">Special Rapporteur on contemporary forms of slavery</a>.</li> <li>• United Nations. <a href="#">Human Rights Council-mandated Investigative Bodies</a>.</li> <li>• International Labour Organization. <a href="#">What are forced labour, modern slavery and human trafficking?</a>.</li> <li>• International Labour Organization. <a href="#">Ratifications for Canada</a>.</li> <li>• International Labour Organization. <a href="#">How the ILO Works</a>.</li> <li>• International Labour Organization. <a href="#">Complaints</a>.</li> <li>• International Labour Organization. <a href="#">Fair Recruitment Initiative</a>.</li> <li>• International Labour Organization. <a href="#">Q &amp; A on Business and Forced Labour</a>.</li> <li>• Walkfree. <a href="#">Global Slavery Index</a>. 2018.</li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Criminal Code of Canada</a>.</li> <li>• Public Safety Canada. <a href="#">Human Trafficking</a>.</li> <li>• Criminal Justice. <a href="#">Human Trafficking</a>.</li> <li>• Public Safety Canada. <a href="#">Human Trafficking National Coordination Centre</a></li> <li>• Statistics Canada. <a href="#">Trafficking in Persons in Canada</a>. 2020.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Employment Standards Code</a>.</li> <li>• Ministry of Jobs, Economy and Trade. <a href="#">Alberta Employment Standards rules</a>.</li> <li>• Ministry of Jobs, Economy and Trade. <a href="#">Make and Employment Complaint</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Legislation</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Annual Reports</a>.</li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>   |
| <p><b>4.1.3</b></p>             | <p><b>Child labour shall not be used.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b></p>   |

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The International Labour Organization (ILO) does not provide a standardised definition of child labour but notes that the term child labour is often defined as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It refers to work that:

- Is mentally, physically, socially, or morally dangerous and harmful to children; and
- Interferes with their schooling by:
  - Depriving them of the opportunity to attend school;
  - Obliging them to leave school prematurely; or
  - Requiring them to attempt to combine school attendance with excessively long and heavy work.

According to ILO Convention C138, employment at the age of 15 (or the age of completing compulsory schooling) is allowed if it does not jeopardise the health, safety, or morals of young persons. Light work for children between the ages of 13-15 is allowed.

Absence of child labour is an important right and where this right is restricted or absent, the potential exists for employers to force children to miss school, and work in unfair or unsafe situations. Children may have higher levels of workplace injury, be unable to perform some tasks properly and may lack the judgment to make critical decisions.

The United Nations (UN) Convention on the Rights of the Child was signed by Canada in 1990 and ratified in 1991. Principle 9 of the Convention addresses child labour. Canada is signatory to the two relevant ILO Conventions: C138– Minimum Age Convention (1973, ratified 2016) and C182–Worst Forms of Child Labour Convention (1999, ratified 2000). Through provincial labour laws, the Alberta Ministry of Jobs, Economy and Trade (MJET) regulates employment in the province, including the forest industry. The Alberta Employment Standards Code sets standards for the employment of children. Sections 65 and 66 of the Code specifies the minimum age of employment is 15, exempt in situations where the written consent of the parent or guardian and the Director of Employment Standards have been granted. The Code, in line with the School Act, has requirements for schooling to be prioritised.

### **Enforcement and monitoring**

The UN has a Committee on the Rights of the Child. Each member state which has ratified the Convention reports on a five year period to the Committee. The ILO's International Programme on the Elimination of Child Labour was created in 1992 with the overall goal of the progressive elimination of child labour, which was to be achieved through strengthening the capacity of countries to deal with the problem and promoting a worldwide movement to combat child labour. MJET implements the Employment Standards Code. The Ministry maintains a website outlining employment rights and support in addressing problems. The Ministry reviews and, where acceptable, issues permits for children under the age of 15 to work. Trade unions support the prevention and elimination of child labour through collective bargaining agreements are honoured. Typically, within the Alberta forestry sector, company hiring policies require an education requirement of Grade 12, which would require people meeting that standard to be older than the minimum age of 15 years.

The UN Committee on the Rights of the Child reviews the reports from states parties and provides implementation and improvement recommendations. The ILO has a procedure that allows a complaint to be filed against a member state for not complying with a ratified convention. Complaints are investigated with the action dependent upon the particulars of the case. Several international organisations, including the ILO, track labour statistics and conditions and publish country assessments and rankings. These could be used as a basis for the ILO to sanction Canada for non-conformance with ILO requirements. The ILO regularly examines the application of standards in member states and points out areas where standards could be better applied.

International organisations such as the United Nations Children's Fund (UNICEF) and Maplecroft conduct country-level monitoring programs that consider employment conditions, treatment of employees and other labour-related conditions. MJET oversees the Employment Standards Code and maintains an anonymous

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|                                     | <p>tip line which is publicly available where anyone can report suspected violations with the Code. Complaints received will be investigated and enforcement actions may be taken. MJET decisions may be referred to the Alberta Labour Relations Board. The Alberta Labour Relations Board self-reports on outcomes publicly and publishes all decisions on the Board’s website and the Canadian Legal Information Institute website.</p> <p>There was no consistent framework found for oversight of child labour by trade unions and companies.</p> <p>As of September 2023, the UN has initiated 37 investigative inquiries globally; none were in Canada. ILO Commissions of Inquiry are rare and taken against countries, not regions or companies. Commissions are initiated only when a country has persistent and serious violations. As of September 2023, only 14 Commissions have been convened. Outcomes of Commissions are publicly available. In September 2023, the ILO does not list North America as a region at risk of child labour. While child labour is a global concern and all countries have some instances of child labour, UNICEF reports a negligible amount of child labour in Canada in 2022 (the last reporting period available at the time of writing in September 2023). In 2014, (the last reporting period available at the time of writing in September 2023) the Child Labour Index does not list Canada as a country at-risk of child labour. The number of child workers is not reported by province in Canada.</p> <p>The Alberta Labour Relations Board receives and resolves hundreds of grievances annually. In 2022/23 Case Resolution by Category Report (the last report available as of September 2023), the Board reported having 16 open employment standards appeals cases at the beginning of the annual period, receiving 48 and concluding 48. An internet review conducted in September 2023 does not indicate that child labour is an issue of concern in Alberta.</p> <p><b>Risk conclusion and justification</b></p> <p>The legal requirements for minimum age for employment align with ILO requirements and there is no indication of child labour as an issue of concern within the Alberta forest industry. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Workforce/employment records</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>  |

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| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• International Labour Organization. <a href="#">Child Labour</a>.</li> <li>• International Labour Organization. <a href="#">Ratifications for Canada</a>.</li> <li>• International Labour Organization. <a href="#">How the ILO Works</a>.</li> <li>• International Labour Organization. <a href="#">Complaints</a>.</li> <li>• International Labour Organization. <a href="#">Child Labour Country Dashboard</a>.</li> <li>• International Labour Organization. <a href="#">About the International Programme on the Elimination of Child Labour</a>.</li> <li>• Maplecroft. <a href="#">Child Labour Index</a>. 2014.</li> <li>• United Nations. <a href="#">Ratifications for Canada</a>.</li> <li>• United Nations. <a href="#">Convention on the Rights of the Child</a>. 20 November 1989.</li> <li>• United Nations. <a href="#">Committee on the Rights of the Child</a>.</li> <li>• United Nations. <a href="#">Human Rights Council-mandated Investigative Bodies</a>.</li> <li>• United Nations Children’s Fund. <a href="#">Implementing and monitoring the Convention on the Rights of the Child</a>.</li> <li>• United Nations Children’s Fund. <a href="#">Child Labour</a>. 2022.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Employment Standards Code</a>.</li> <li>• Alberta Ministry of Jobs, Economy and Trade. <a href="#">Employment standards rules - Youth employment laws</a></li> <li>• Alberta Ministry of Jobs, Economy and Trade. <a href="#">Adolescent Employment Permit</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Legislation</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Annual Reports</a>.</li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>  |
| <p><b>4.1.4</b></p>             | <p><b>Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.</b></p>  |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>International Labour Organization (ILO) Convention 111 describes discrimination as:<br/>(a) Any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.</p>  |

(b) Such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by the member concerned after consultation with representative employers' and workers' organisations, where such exist, and with other appropriate bodies.

The Convention continues by noting that any distinction, exclusion or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be discrimination.

Absence of discrimination in the labour force is an important right in a just society, and where it is restricted or absent, the potential exists for employers to limit workers with certain characteristics or ethnicities from fully accessing employment and related opportunities, and/or receiving an unfair level of remuneration for work. Potential threats/impacts include a dissatisfied workforce, divisions within the workforce due to discrimination against some, higher levels of employee turnover and absenteeism, lawsuits, and legal action against the company.

Principles of equity and non-discrimination are foundational to the United Nations (UN) Universal Declaration on Human Rights, of which Canada is a signatory.

Canada is a signatory to the two ILO Conventions relevant to this Indicator:

- C100–Equal Remuneration Convention (1951, ratified 1972); and
- C111–Discrimination in Respect of Employment and Occupation Convention (1958, ratified 1964).

The primary piece of anti-discrimination legislation in Canada is the Canadian Charter of Rights and Freedoms. Section 28 of the Charter states that the rights and freedoms in the Charter “are guaranteed equally to male and female persons.”

Alberta’s Human Rights Act prohibits discrimination and harassment based on race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, or sexual orientation. Human rights related to employment are included in Sections 6 to 9. Equal pay for the same (or substantially the same) work is specified in Section 6(1).

### **Enforcement and monitoring**

The UN Universal Declaration of Human Rights is implemented by the Committee on the Elimination of Discrimination. Two conferences on anti-discrimination have been held and several days of observance have been declared. The UN has published several documents to support organisations in identifying and eliminating discrimination. Issues of discrimination are core throughout the ILO’s work. For instance, programmes to fight forced labour help provide greater rights to women as this is an issue that primarily affects women. As a result, the other Indicators within this Criterion provide insight to implementation of anti-discrimination programmes by the ILO. In addition, the ILO specifically provides guidelines on labour law regarding discrimination and may provide advice on legislative changes.

The Canadian Human Rights Commission implements the Canadian Charter of Rights and Freedoms. It is responsible for representing the public interest and holding the Government of Canada to account on matters related to human rights. The Commission operates independently from government and acts to implement the Charter through research, raising awareness, and speaking out on any matter related to human rights in Canada. Provincially, the Alberta Human Rights Commission implements the Alberta Human Rights Act through public education and community-based initiatives.

The UN has appointed a Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance, and monitors discrimination globally through the Special Procedures of the Human Rights Council. The UN conducts investigations regarding alleged violations of human rights. The ILO regularly examines the application of standards in member states and points out areas where standards could be better applied.

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|                                     | <p>The ILO has a procedure that allows a complaint to be filed against a member state for not complying with a ratified Convention. Complaints are investigated with the action dependent upon the particulars of the case. Several international organisations, including the ILO, track labour statistics and conditions and publish country assessments and rankings. These could be used as a basis for the ILO to sanction Canada for non-conformance with ILO requirements.</p> <p>The Canadian Human Rights Commission receives discrimination complaints and works with both the complainant and respondent to resolve issues through mediation. When a complaint cannot be settled, or when the Commission determines that further examination is warranted, it may refer the complaint to the Canadian Human Rights Tribunal. Similarly, the Alberta Human Rights Commission oversees the Alberta Human Rights Act through resolution and settlement of complaints of discrimination, and through Human Rights Tribunal and court hearings. Individuals can make complaints directly to the Commission.</p> <p>As of September 2023, the UN has initiated 37 investigative inquiries globally; none were in Canada. ILO Commissions of Inquiry are taken against countries, not regions or companies. Commissions are initiated only when a country has persistent and serious violations. As of September 2023, only 14 Commissions have been convened. Outcomes of Commissions are publicly available. Human Rights Watch reports on human rights issues globally. A review of Human Rights Watch reports in September 2023 showed several issues are noted in Canada, none of which are directly related to employment practices. In September 2023, the World Economic Forum rates Canada 30 out of 146 countries on the Global Gender Gap Index.</p> <p>There is some level of discrimination in Canadian society, and some of this may occur in the forest sector. Statistics Canada report a pay gap of 11.1% between men and women in Canada in 2021. Pay gaps are also reported for most visible minorities. Statistics Canada also reports that 38.2% of all Canadians experienced discrimination at some point before or since the pandemic. The Alberta government publishes an annual Alberta’s Forest Economy report. The report outlines three workplace profiles related to discrimination: age of workers, proportion of the workforce that is Indigenous, and proportion of the workforce that identifies as male versus female. The report indicates that the age of the workforce is increasing, the number of Indigenous workers is increasing, and the proportion of the workforce that identifies as female has remained steady from 2016 to 2021. An internet review conducted in September 2023 does not indicate that there are serious issues of discrimination in the forest industry in Alberta.</p> <p><b>Risk conclusion and justification</b></p> <p>The legal requirements for discriminations are comprehensive and align with ILO requirements. Active measures continue to be taken against discrimination by the federal and provincial governments. There is no indication of discrimination as an issue of concern within the forest industry. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Workforce/employment records</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>   |

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| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• International Labour Organization. <a href="#">C111 - Discrimination (Employment and Occupation Convention)</a>. 1958</li> <li>• International Labour Organization. <a href="#">Ratifications for Canada</a>.</li> <li>• International Labour Organization. <a href="#">C100 - Equal Remuneration Convention</a>. 1951.</li> <li>• International Labour Organization. <a href="#">How the ILO Works</a>.</li> <li>• International Labour Organization. <a href="#">Complaints</a>.</li> <li>• United Nations. <a href="#">Universal Declaration of Human Rights</a>. 10 December 1948.</li> <li>• United Nations. <a href="#">Committee on the Elimination of Racial Discrimination</a>.</li> <li>• United Nations. <a href="#">Human Rights Council-mandated Investigative Bodies</a>.</li> <li>• Human Rights Watch. <a href="#">Canada: Events of 2019</a>.</li> <li>• World Economic Forum. <a href="#">Global Gender Gap Report 2021: Insight Report</a>. 203.</li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Canadian Justice Laws. <a href="#">The Constitution Acts, 1867 – 1982</a>.</li> <li>• Canadian Human Rights Commission. <a href="#">Homepage</a>.</li> <li>• Canadian Human Rights Tribunal. <a href="#">Homepage</a>.</li> <li>• Statistics Canada. <a href="#">Pay Gap 1998-2021</a>.</li> <li>• Statistics Canada. <a href="#">Discrimination before and since the start of the pandemic</a>. 2022.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Human Rights Act</a>.</li> <li>• Alberta Human Rights Commission. <a href="#">Homepage</a>.</li> <li>• Alberta Human Rights Tribunal. <a href="#">Homepage</a>.</li> </ul> <p><a href="#">Alberta's Forest Economy A Handbook of Public Economic and Socioeconomic Accounts</a></p> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>  |
| <p><b>4.1.5</b></p>             | <p><b>Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b></p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

The International Monetary Fund defines minimum wage as “the minimum amount of remuneration that an employer is required to pay wage earners for the work performed during a given period, which cannot be reduced by collective agreement or an individual contract.” Minimum wages are typically expressed in dollars per hour, are often regionally based, and tied to a consumer price index. Paying less than minimum wage can often be an issue when employees are paid informally or under the table. Some aspects of pay and employment conditions have been addressed in the following Indicators:

- 4.1.1 Freedom of Association
- 4.1.2 No Forced or Compulsory Labour
- 4.1.3 No Child Labour
- 4.1.4 No Workers Discrimination

As legal minimum wages are regionally based and tied to consumer price indices, minimum wages establish a level of payment for a base standard of living. When minimum wages are not paid, the level of poverty increases, people are not incentivised to join the workforce, and income inequality increases. Poor working conditions also lead to high rates of employee turnover and absenteeism, job dissatisfaction, and poor health of workers and their families.

Under the Constitution of Canada, the responsibility for setting minimum wages for labour rests with the provinces.

Through provincial labour laws, the Alberta Ministry of Jobs, Economy and Trade (MJET) regulates employment in the province, including the forest industry. The Alberta Employment Standards Code sets standards for working hours. Section

8.1 of the Code specifies that employers must pay the minimum wage for employment. Section 4 of the Code specifies that an employer must adhere to the minimums of the Code regardless of whether the employee or trade union agrees to a lower wage.

### **Enforcement and monitoring**

Alberta’s MJET oversees the Employment Standards Code and provides information on the website about minimum wages for employment. There is a publicly available anonymous tip line where anyone can report suspected violations with the Code. Trade unions negotiate wages collectively on behalf of employees. Collective agreements are made public. The union can monitor salaries to ensure salaries are as agreed and workers can report to the unions if they believe they are not being paid according to the agreement. Wage structure is usually led by a company’s human resources department, and many companies have remuneration policies and systems set up so employees are paid a legal wage.

MJET oversees the Employment Standards Code. There is a publicly available anonymous tip line where anyone can report suspected violations with the Code.

Ministry decisions may be referred to the Alberta Labour Relations Board. The Alberta Labour Relations Board self-reports on outcomes publicly and publishes all decisions on the Board’s website and the Canadian Legal Information Institute website.

As of September 2023, the minimum wage for most workers in Alberta is \$15/hour. The Canadian government reports, as of September 2023, the average wage of a forestry worker (labourer, logging, and forestry workers) in Alberta is \$17.00/hr. As of September 2023, the Alberta government website reports starting wages for silviculture and forestry workers is \$21.83/hr and forestry professionals is \$30.40/hr. A search of all regions indicates that even the lowest paid forestry workers in Alberta are paid above the legal minimum wage. The 2023 Alberta’s Forest Economy Report reports the lowest paid forestry workers are silviculturists and these workers’ annual salary, when converted to an hourly wage, exceed the legal minimum wage. The Alberta Labour Relations Board receives and resolves hundreds of grievances annually. In 2022/23 Case Resolution by Category Report (the last report available as of September 2023), the Board reported having 16 open employment standards appeals cases at the beginning of the annual period, receiving 48 and concluding 48. An internet review does not indicate payment below legal minimum wage or paying under the table is an issue of concern in Alberta within the forest industry.

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |   |
|------------------------------|---|
|                              | <p><b>Risk conclusion and justification</b></p> <p>The legal requirements for workers’ wages are comprehensive and align with ILO requirements. Receiving and paying a legal minimum wage is a cultural norm in Canada. There is no indication minimum wage is not being paid for employment. There is a competitive job market within the forest industry. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p>  |
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Workforce/employment records</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>  |
| <i>Evidence reviewed</i>     | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Canadian Justice Laws. <a href="#">The Constitution Acts, 1867 – 1982.</a></li> <li>• Government of Canada. <a href="#">Prevailing Wages In Canada: Labourer, Logging and Forestry: Alberta.</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Employment Standards Code.</a></li> <li>• Ministry of Jobs, Economy and Trade. <a href="#">Employment Standards Rules –Minimum Wage.</a></li> <li>• Government of Alberta. Silviculture and Forestry Worker <a href="#">Wages and Salaries.</a></li> <li>• Government of Alberta. <a href="#">Forestry Professional Worker Wages and Salaries.</a></li> <li>• Government of Alberta. <a href="#">Alberta’s Forest Economy.</a> 2023.</li> <li>• Alberta Labour Relations Board. <a href="#">Legislation.</a></li> <li>• Alberta Labour Relations Board. <a href="#">Annual Reports.</a></li> </ul> |
| <i>Risk rating</i>           | Provincial <b>Low Risk</b>  |
| <b>4.1.6</b>                 | <b>Working hours shall comply with legal requirements.</b>  |
| <i>Findings</i>              | <b>Scale of assessment</b>  |

Provincial

### **Analysis**

Legal working hours refer to the maximum number of hours an employee can be required to work by law. The specific definition of legal working hours can vary depending on the country and jurisdiction, but it typically includes provisions related to daily and weekly limits on working time, mandatory breaks and rest periods and restrictions on overtime and night work. Legal working hours is related to Indicator 4.1.2 No Forced or Compulsory Labour.

Excessive working hours increase the probability of developing health issues and being involved in accidents. The forest sector has a number of jobs that are physically and mentally demanding, thus compounding the risk of occupational- related illness and injury.

Canada is a signatory to the International Labour Organization (ILO) Convention C1 on Working Hours (1919, ratified 1935). The Alberta Employment Standards Code sets standards for working hours. Sections 16-19 of the Code specifies that hours of work be confined within a 12- hour period and that a day of rest be provided weekly, with variations depending on the number of consecutive days worked. Additional regulations are established for logging.

### **Enforcement and monitoring**

The ILO implements the working hours convention by bringing together governments, employers, and workers to set labour standards, develop policies, and devise programs. If there are any problems in the application of standards, the ILO seeks to assist countries through social dialogue and technical assistance. Through provincial labour law, the Alberta Ministry of Jobs, Economy and Trade (MJET) regulates employment in the province, including the forest industry. The Ministry provides information on the website about working hours. Trade unions negotiate working hours collectively on behalf of employees. Collective agreements are made public. The union can monitor working hours to ensure hours are as agreed, and workers can report to unions if they believe they are being asked or required to work hours that are outside of the agreed-upon parameters. The establishment of working hour parameters is usually led by a company's human resources department, and many companies have working hour policies and systems set to ensure work hours are within the legal requirements.

The ILO has a procedure that allows a complaint to be filed against a member state for not complying with a ratified Convention. Complaints are investigated with the action dependent upon the particulars of the case. Several international organisations, including the ILO, track labour statistics and conditions and publish country assessments and rankings. These could be used as a basis for the ILO to sanction Canada for non-conformance with ILO requirements. The ILO regularly examines the application of standards in member states and points out areas where standards could be better applied. MJET maintains a publicly available anonymous tip line where anyone can report suspected violations with the Code. Ministry decisions may be referred to the Alberta Labour Relations Board. The Alberta Labour Relations Board self-reports on outcomes publicly and publishes all decisions on the Board's website and the Canadian Legal Information Institute website.

ILO Commissions of Inquiry are taken against countries, not regions or companies. Commissions are initiated only when a country has persistent and serious violations. As of September 2023, only 14 Commissions have been convened. Outcomes of Commissions are publicly available. The Alberta Labour Relations Board receives and resolves hundreds of grievances annually. In 2022/23 Case Resolution by Category Report (the last report available as of September 2023), the Board reported having 16 open employment standards appeals cases at the beginning of the annual period, receiving 48 and concluding 48. No additional results at the provincial level for this Indicator were found. An internet review, conducted in September 2023, does not indicate that working outside of the requirements of the Alberta Employment Standards Code is an issue of concern in Alberta within the forest industry.

### **Risk conclusion and justification**

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |   |
|------------------------------|---|
|                              | The legal requirements for working hours are comprehensive and align with ILO requirements. There is no indication the legal requirements for working hours are not being met. There is a competitive job market within the forest industry. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.   |
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Salary Benchmarks by industry and region</li> <li>• Workforce/employment records</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>  |
| <i>Evidence reviewed</i>     | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• International Labour Organization. <a href="#">C001 - Hours of Work (Industry) Convention</a>. 1919.</li> <li>• International Labour Organization. <a href="#">Ratifications for Canada</a>.</li> <li>• International Labour Organization. <a href="#">How the ILO Works</a>.</li> <li>• International Labour Organization. <a href="#">Complaints</a>.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Employment Standards Code</a>.</li> <li>• Alberta Ministry of Jobs, Economy and Trade. <a href="#">Employment Standards Rules – Hours of Work and Rest</a>.</li> <li>• Alberta Ministry of Jobs, Economy and Trade. <a href="#">Logging and Lumbering: Employment Standards Exceptions</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Legislation</a>.</li> <li>• Alberta Labour Relations Board. <a href="#">Annual Reports</a>.</li> </ul> |
| <i>Risk rating</i>           | Provincial <b>Low Risk</b>  |
| <b>4.1.7</b>                 | <b>Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation.</b>   |
| <i>Findings</i>              | <p><b>Scale of assessment</b></p> <p>Provincial</p>   |

### Analysis

The International Labour Organization (ILO) has been concerned with worker security and compensation since its founding in 1919. The six components of this Indicator that collectively are basic social protections are:

- Health care provisions;
- Sickness benefits;
- Retirement benefits;
- Invalidity benefits;
- Death benefits; and
- Worker's compensation.

Social protections are one of the four strategic objectives of the ILO's "Decent Work" agenda. Collective agreements between employees and employers often contain provisions for social protections. See Indicator 4.1.1 Freedom of Association for information on trade unions broadly.

Social protections are essential for employers and employees. It ensures good working conditions, attracts workers, and provides security for employees. Social protections support workers and workers' family members in case of injury, accidents, health issues, job loss, and retirement, and ensure workers are able to maintain a decent standard of living for themselves and their families even when unable to work or when they face an unexpected circumstance such as illness, injury, or death. Potential threats/impacts include a dissatisfied workforce, higher levels of employee turnover and absenteeism, and lawsuits and legal action against the company.

#### Health Care Provisions

Canada has a national public health care system established by the Canadian Health Care Act. It is funded by the federal government and administered by the provincial government. Under this system, all Canadian residents have reasonable access to medically necessary hospital and physician services without paying out-of-pocket. The Alberta Health Act provides the legal framework for the provision of health services in Alberta.

#### Sickness Benefits

The Canadian Employment Insurance Act provides benefits in case of illness, injury or quarantine, pregnancy, and parental leave. It is available to all workers throughout Canada. Self-employed workers are able to register for benefits.

#### Retirement Benefits

Retirement is provided to workers and their families federally through the Canada Pension Plan. Income provided under the Plan is dependent on lifetime registered earnings and, for retirement income, the age of retirement. The Old Age Security Act provides a base level of retirement income for all Canadians, regardless of registered earning under the Old Age Security Program.

#### Invalidity Benefits

Disability income is provided to workers and their families federally through the Canada Pension Plan. See Retirement Benefits above for more information on the Canada Pension Plan.

#### Death Benefits

A death benefit is provided to workers' spouses federally through the Canada Pension Plan. See Retirement Benefits above for more information on the Canada Pension Plan. In some instances there is an allowance for the survivor benefit under the Canadian Old Age Security Act. See Retirement Benefits above for more

## Annex 1 Detailed findings for Supply Base Evaluation

information on the Canada Pension Plan.

### Workers' Compensation

In Alberta, the Workers' Compensation Act provides the legal framework for the administration of workplace injury and illness prevention, return to work, assessment, and compensation program. The legislation requires that all employees are registered for workers compensation. Self-employed workers' and business owners are eligible to apply for coverage.

### **Enforcement and monitoring**

#### Health Care Provisions

The Canada Health Care Act is administered by Health Canada. Health Canada provides a number of services such as drug testing and approval; food and nutrition guidance; product safety etc. In Alberta, front line provision of health services is provided by the Alberta Ministry of Health. The Ministry is responsible for providing health services such as family doctors, hospitals, addiction services, and other related services. Trade unions negotiate benefits in addition to those provided by the government collectively on behalf of employees. Collective agreements are made public. The union can both monitor the implementation of the provision of benefits to ensure the benefits are as agreed and workers can report to unions if they believe they are not being provided benefits according to the agreement. The establishment of benefits in addition to those provided by the government is usually led by a company's human resources department, and many companies have policies and systems set up to ensure the provision of additional benefits are equitable.

#### Sickness Benefits

The Canadian Employment Insurance Act is administered by the Employment and Social Development Canada (ESDC). ESDC maintains the informational website; runs promotional/educational campaigns; collects premiums from employers; accepts applications from employees needing employment, disability, or retirement support; and liaises with workers throughout the process of receiving benefits. See Health Care Provisions above for implementation mechanisms by trade unions and companies.

#### Retirement Benefits

The Canada Pension Plan and Canadian Old Age Security Act are administered by ESDC. See Sickness Benefits for implementation measures by ESDC above. See Health Care Provisions above for implementation mechanisms by trade unions and companies.

#### Invalidity Benefits

The Canada Pension Plan is administered by ESDC. See Sickness Benefits for implementation measures by ESDC above. See Health Care Provisions above for implementation mechanisms by trade unions and companies.

#### Death Benefits

The Canada Pension Plan and Canadian Old Age Security Act are administered by ESDC. See Sickness Benefits for implementation measures by ESDC above. See Health Care Provisions above for implementation mechanisms by trade unions and companies.

#### Workers' Compensation

In Alberta, the Workers' Compensation Act is administered by the Alberta Workers' Compensation Board. The Board maintains the informational website; collects premiums from employers; accepts applications from employees who are made ill or injured on the job; and liaises with workers throughout the process of recovery and return to work. The Alberta Workers' Compensation Act creates the Appeals Commission for the Alberta Workers' Compensation Board, which is an independent, quasi-judicial tribunal that hears appeals of decisions made by the Alberta WCB and makes binding decisions. See Health Care Provisions above for implementation mechanisms by trade unions and companies.

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### Health Care Provisions

The Government of Alberta conducts periodic reviews of the health care service in the province. There are several national and international, government and non-government, health care watchdog organisations including, but not limited to the World Health Organization, Commonwealth Fund, the Canadian Institute for Health Information and the Conference Board of Canada. See Indicator 4.1.1 Freedom of Association for comments on the oversight of trade unions broadly. There was no consistent oversight framework found for oversight of the provision of any social benefits by trade unions and companies.

### Sickness Benefits

Decisions made by ESDC can be appealed with ESDC and ultimately to the Social Security Tribunal for independent review. The Employment Insurance program is additionally overseen by the Canada Employment Insurance Commission, which publishes an annual monitoring and assessment report on the impact and effectiveness of the program. See Indicator 4.1.1 Freedom of Association for comments on the oversight of trade unions broadly. See Health Provisions for oversight of trade unions and companies.

### Retirement Benefits

See Sickness Benefits above on appealing decisions of ESDC. While there is oversight on how the Canadian Pension Plan investments are managed, no oversight mechanism for the Canada Pension Plan and Old Age Security Act, in terms of delivery to workers, was found. See Indicator 4.1.1 Freedom of Association for comments on the oversight of trade unions broadly. See Health Provisions for oversight of trade unions and companies.

### Invalidity Benefits

See Sickness Benefits above on appealing decisions of ESDC and oversight by the Canada Employment Insurance Commission. While there is oversight on how the Canadian Pension Plan investments are managed, no oversight mechanism for the Canada Pension Plan and Old Age Security Act, in terms of delivery to workers, was found. See Indicator 4.1.1 Freedom of Association for comments on the oversight of trade unions broadly. See Health Provisions for oversight of trade unions and companies.

### Death Benefits

See Sickness Benefits above on appealing decisions of ESDC. While there is oversight on how the Canadian Pension Plan investments are managed, no oversight mechanism for the Canada Pension Plan and Old Age Security Act, in terms of delivery of death benefits to workers' families, was found. See Indicator 4.1.1 Freedom of Association for comments on the oversight of trade unions broadly. See Health Provisions for oversight of trade unions and companies.

### Workers' Compensation

There is a process by which Alberta Workers' Compensation Board decisions and the fairness of the process can be reviewed. There are independent advisors to provide support free of charge. The Government of Alberta conducts periodic reviews of independent agencies. The Board's decisions can be appealed to the Appeals Commission of Alberta Worker's Compensation. The Commission publishes annual report on the Commission's website and publishes all decisions on the Canadian Legal Information Institute website. See Indicator 4.1.1 Freedom of Association for comments on the oversight of trade unions broadly. See Health Provisions for oversight of trade unions and companies.

### Health Care Provisions

As of 2018, the Commonwealth Fund Report ranks provision of health care in Canada ninth out of 11 high-income countries evaluated, while the World Health Organization and the Healthcare Access and Quality Index from the Global Burden of Disease Study place Canada in the top 10% of countries. As of September 2023, the Canadian Institute for Health Information reports on 26 criteria of "appropriateness and effectiveness" and "Health Status:. Of those 26 criteria, nine are above average; five are the same; and 12 are below average performance when compared to the Canadian average performance. In 2015, the Conference Board of Canada assigns health performance in Alberta at a "B" (on an A-D scale with A being best), rating it 13 out of 29 evaluated jurisdictions.

A review of Alberta Health Services was completed in 2019 Ernst and Young. The review provides over 50 recommendations but overall provides praise for a complex system. An internet search, conducted in September 2023, found that there is an ongoing discussion about the long-term viability and effectiveness of all

## Annex 1 Detailed findings for Supply Base Evaluation

of Canada's health programs, but there was no immediate concern identified.

### Sickness Benefits

In fiscal year 2021 (April 1, 2020 to March 31, 2021), the Canadian Employment Insurance Commission reports that 90.7% of people needing employment insurance were granted support, up from 73.6% the year before. This period during the pandemic saw almost double the number of claims over the preceding fiscal year and payments increased from \$11.1 billion dollars to \$24.9 billion dollars. An internet search, conducted in September 2023, found that there is an ongoing discussion about the long-term viability of Canada's government benefits programs, but there was no immediate concern identified.

### Retirement Benefits

No result for the Canada Pension Plan and Old Age Security Act in terms of delivery to workers was found. An internet search, conducted in September 2023, found that there is an ongoing discussion about the long-term viability of Canada's government pension programs, but there was no immediate concern identified.

### Invalidity Benefits

In fiscal year 2021 (April 1, 2020 to March 31, 2021), the Canadian Employment Insurance Commission reports that eight out of ten claims for a sickness benefit were paid out, with attribution of non-paying claims being the result of special conditions created by the COVID pandemic. Special measures were implemented by ESDC in the second half of the period to better meet the needs of individuals during the pandemic.

### Death Benefits

No result for the Canada Pension Plan and Old Age Security Act in terms of delivery of death benefits to workers' families was found. An internet search conducted in September 2023, found that there is an ongoing discussion about the long-term viability of Canada's government pension programs, but there was no immediate concern identified.

### Workers' Compensation

The 2017 Government of Alberta review of the Workers' Compensation Board found that the majority of the claims were handled smoothly and resolved within two weeks. The review found that complex cases suffered with the strict processes implemented by the Board and that significant trust had been lost between workers and employers and the Board. Significant changes were made to the workers compensation process in 2021 and the impact of these changes has not yet been reviewed. In the Appeals Commission of Alberta Worker's Compensation. 2022/2023 annual report (the last report available as of September 2023), the Commission reports hearing 592 appeals. The report does not indicate if appeals were decided in favour of the Alberta WCB or not, however, a client exit survey over the 12 month period of the annual report found that 95% of respondents said Commission staff were friendly and professional before the hearing; 90% reported feeling safe and respected during the hearing; and 92% felt needs were understood during the hearing.

### **Risk conclusion and justification**

The legal requirements for providing benefits are comprehensive and align with ILO requirements. In Canada, there is a cultural norm that workers are provided these benefits. There is a competitive job market within the forest industry. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.

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### *Means of verification*

- Regulatory framework
- Regulatory agency websites
- Company human resources policies/procedures
- Regulatory compliance and enforcement data/reports
- Oversight agency database records and/or reports
- Publicly available information (reports, news & websites)
- Workforce/employment records
- Interviews with regulatory/oversight agency
- Interviews with trade unions
- Interviews with workers

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| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>International Labour Organization. <a href="#">Mission and Impact of the ILO.</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li><a href="#">Canada Health Act.</a></li> <li><a href="#">Employment Insurance Act.</a></li> <li><a href="#">Canada Pension Plan.</a></li> <li><a href="#">Old Age Security Act.</a></li> <li><a href="#">Canada health care system.</a></li> <li><a href="#">Employment and Social Development Canada.</a></li> <li>Employment and Social Development Canada. <a href="#">Request for reconsideration of an Employment Insurance decision.</a></li> <li>Social Security Tribunal of Canada. <a href="#">Homepage.</a></li> <li>Government of Canada. <a href="#">Canada Employment Insurance Commission.</a></li> <li>Canada Employment Insurance Commission. <a href="#">2020/2021 Employment Insurance Monitoring and Assessment Report.</a></li> <li>Canadian Institute for Health Information. <a href="#">Homepage.</a></li> <li>Conference Board of Canada. <a href="#">Health Report Card.</a> February 2015.</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li><a href="#">Alberta Health Act.</a></li> <li><a href="#">Workers' Compensation Act.</a></li> <li>Alberta Workers' Compensation Board. <a href="#">Homepage.</a></li> <li>Alberta Workers' Compensation Board. <a href="#">For Workers.</a></li> <li>Government of Alberta. <a href="#">Workers Compensation Board (WCB) Review.</a></li> <li>Appeals Commission for Alberta Workers' Compensation. <a href="#">Homepage.</a></li> <li>Appeals Commission for Alberta Workers' Compensation. <a href="#">2022/2023 Annual Report.</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>Finlay A. McAlister, Peter Cram and Chaim Bell. <a href="#">Comparing Canadian health care to that in other countries: looking beyond the headlines.</a> 2018.</li> <li>Earnst and Young. <a href="#">Alberta Health Services Performance Review. Summary Report.</a> 31 December 2019.</li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>   |

## Annex 1 Detailed findings for Supply Base Evaluation

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| <p><b>4.1.8</b></p>    | <p><b>Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.</b></p>   |
| <p><i>Findings</i></p> | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>Workers, which includes employees and contractors who work in the forest, need to be trained to make appropriate decisions and to implement best management practices related to specific job functions. The intent of this Indicator is to ensure workers are provided the knowledge, skills, and abilities required to perform jobs effectively and safely through proper training and certificates. Proper training can improve worker productivity, reduce errors and accidents, increase job satisfaction, and ultimately contribute to the success of the business.<br/>Elements related to this Indicator are also discussed and assessed in the following Indicators:</p> <ul style="list-style-type: none"> <li>• Health and safety requirements and safeguarding are described in 4.1.10 Workers’ H&amp;S Safeguards;</li> <li>• Waste disposal training is described in Indicator 2.2.8 Waste Disposal.</li> </ul> <p>The focus of this indicator is to ensure that forest workers are trained in the forest planning and operations processes. Inadequate or infrequent training increases risk of forest worker errors and mistakes and the risk of environmental damage. Potential application of incorrect management practices can result in site damage, reduction of timber harvest quality, and non- compliance issues with Regulations and operational plans.</p> <p>Provincial</p> <ul style="list-style-type: none"> <li>• Regulated Forest Management Profession Act</li> <li>• Regulated Forest Management Profession Regulation</li> <li>• Forests Act</li> <li>• Timber Management Regulation</li> </ul> <p><b>Enforcement and monitoring</b></p> <p>The Regulated Forest Management Profession Act (RFMPA) and Regulated Forest Management Profession Regulation are the legislation which ensures the competence, accountability, and protection of the public interest within self-regulated professionals in Alberta RFMPA is only applicable to regulated professionals and that all other forestry workers fall outside the parameters of that legislation. Representing over 1,300 regulated Forest Management Professionals, (representing approximately 7% of the forest industry workforce.</p> <p>AAFMP ensures compliance with the Regulated Forestry Management Profession Act, and provides professional training opportunities. AAFMP is a self-governing professional regulatory organisation for Alberta’s forest management professionals. AAFMP’s regulatory framework ensures the ongoing training and competence of forest professionals registered to practice in Alberta.</p> <p>AAFMP assesses applicants for admittance to the organisation. The practice of forestry, as described in the RFMPA, is the “development, acquisition or application of scientific principles and practices relating to forestry, products of forested land and integrated management of forested lands and includes several categories of work, including forest inventory, harvesting, silviculture, preparation of forest resource management plans, teaching forestry or conducting research activities</p> |

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related to forestry.” Any individual who qualifies for registration and is practicing forestry, as defined in the RFMPA, must be registered with the AAFMP. Individuals must complete educational requirements and an exam, as well as a continuing competency program to be a member of the AAFMP. To be a Registered Professional Forester (RPF), individuals must have a degree in forestry or environmental sciences from a post-secondary program approved by the AAFMP Council. Individuals must also have 24 months of accumulated mentorship in the practice of forestry.

To be a Registered Professional Forest Technologist (RPFT), individuals must have a diploma or applied degree in forestry or environmental sciences from a post-secondary education program approved by the AAFMP Council. Forest Management Plans in Alberta are prepared by regulated forestry professionals and must follow the Alberta Forest Management Planning Standard. The Alberta Forest Management Planning Standard Annex 2, Role of Regulated Forestry Professionals in Forest Management describes the process for RFPs to validate forest management submissions. Forest management validation requirements and checklists are provided in digital format for RFPs to use when making forest management submissions to the Ministry of Forestry and Parks (MFP). MFP oversees the administration of forestry training for activities that require permitting and certification. Training, including an exam and a recertification process, is provided by the Government of Alberta at the Hinton Training Centre. The Centre provides additional training for forest workers beyond courses required by legislation. Under the Alberta Forests Act and Timber Management Regulation, certain activities, such as timber scaling, require a permit and certification under legislation with a training component.

Forest companies are responsible for ensuring forest workers have the proper training and certificates to effectively implement roles and responsibilities. Training completion and documentation is a component of a forest company’s health and safety program. Forest companies implement training policies through various meetings with contractors, which includes operations-specific information. Contractors provide proof of training to forest companies if requested. Like forest companies, contract companies are responsible for ensuring employees have training and obtain certificates which demonstrate qualifications. As of March 2024, there is no publicly available information describing systematic and consistent training to forest workers across the forest industry in Alberta.

AAFMP has the oversight authority of the RFMPA. Forest professionals are required to submit continuing competency on an annual basis to the AAFMP. Five per cent of practising registrants are audited annually by the AAFMP Competence Committee to ensure that records are accurate and that competency is in line with AAFMP requirements. If a Registrant is not in compliance with the minimum hours at the time of practice permit renewals, the AAFMP Registrar can issue a conditional permit, suspend the practice permit until the conditions have been met, or refuse the practice permit application. Activities that require permitting and certification by the MFP have identified expiration dates and requirements for recertification exams (if applicable). MFP is required to monitoring check scaling and data. The check scaling system is based on randomly selecting logs for check scale measurement and comparing the results against the logs scaled by the company scaler. MFP has the authority to revoke a scaling permit. Company oversight/tracking is completed through internal company-specific processes. As of March 2024, there is no publicly available information describing an oversight framework or reporting of forest worker training.

There are approximately 1,300 RFPs in Alberta, representing approximately 7% of the forest industry workforce. The AAFMP Competence Committee oversees ongoing competency for registered forest professionals. The following table details the 2016/2017 to 2020/2021 continuing competency audit results in AAFMP annual reports:

| Year    | Audits Conducted | Audits Passed | Audits Failed |
|---------|------------------|---------------|---------------|
| 2020/21 | 65               | 64            | 1             |
| 2019/20 | 62               | 62            | 0             |

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| 2018/19 | 60 | 40 | 20 |
| 2017/18 | 71 | 63 | 8  |
| 2016/17 | 66 | 61 | 5  |

The average audit pass rate has been 80%, with the exception of the 2018/19 year. The AAFMP Complaints Committee did not receive any formal complaints from 2018 to 2021. Company-specific forest worker health and safety training requirements are mandated to be on file with the company; however, records of other training requirements are not mandatory. As of March 2024, there is no publicly available results to verify training specific to forest workers.

### Risk conclusion and justification

At the professional level, mandatory requirements are set for academic standards of entry, standards of conduct, continuing competency development, and annual competence assessments. AAFMP's regulatory framework ensures the ongoing training and competence of forest professionals registered to practice in Alberta. At the forest worker level, due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify training for forest workers related to roles and responsibilities, a precautionary approach is applied. As such, this Indicator is designated as specified risk at the provincial level in Alberta.

### Means of verification

- Regulatory framework
- Regulatory agency websites
- Company human resources policies/procedures
- Company training records
- Workforce/employment records
- Regulatory compliance and enforcement data/reports
- Oversight agency database records and/or reports

### Evidence reviewed

- Provincial
- [Association of Alberta Forest Management Professionals Annual Report 2021](#)
  - [Association of Alberta Forest Management Professionals Code of Ethics](#)
  - [Association of Alberta Forest Management Professionals Registration Standards and Practices Manual](#)
  - [Forests Act](#)
  - [Government of Alberta. Hinton Training Centre – Forest management program](#)
  - [Hinton Training Centre – Forest Management Program](#)
  - [Regulated Forest Management Profession Act](#)
  - [Regulated Forest Management Profession Regulation](#)
  - [Report an OHS concern](#)
  - [Alberta OHS - Scaling Standards of Alberta](#)
  - [Timber Management Regulation](#)

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| <i>Risk rating</i> | Provincial <b>Specified risk</b>   |
| <b>4.1.9</b>       | <b>Mechanisms shall be in place for resolving grievances and disputes in the workplace.</b>  |
| <i>Findings</i>    | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b><br/>This Indicator ensures workers have access to an effective system to raise and remedy grievances and disputes related to work conditions. Work conditions are governed by provincial legislation and the measures discussed below. Under labour law (Canadian Labour Congress), a grievance is a violation of the employee's rights on the job—whether under a collective agreement or under legislation. Individual grievances may concern discipline, demotion, remuneration, denied benefits, and harassment. Provision of effective mechanisms for resolving grievances provides an opportunity for issues to be dealt with effectively and limits the escalation of issues. Additionally, it enables learning for all parties, thus reducing the risk of future disputes and grievances. Some issues that may lead to grievances and disputes, as well as the mechanisms for resolving the grievance or dispute, have been assessed under each of the other Indicators of Principle 4.</p> <p>Where there is no mechanism to resolve grievances and disputes, there is an increased risk of employee dissatisfaction. This may result in low productivity, high turnover, and poor organizational culture.</p> <p>The Alberta Human Rights Act addresses situations where grievances and disputes with an employer are related to human rights issues. Sections 20 – 43 relate to the filing and resolution of complaints. The Alberta Employment Standards Code sets standards for employment. Section 82 of the Code specifies that employees have the right to submit complaints and the government is required to have a mechanism to resolve them. The Alberta Labour Relations Code specifies the rights and responsibilities of the Alberta Labour Relations Board and trade unions in Alberta. The Code specifies several layers of dispute resolution.</p> <p><b>Enforcement and monitoring</b><br/>The Alberta Human Rights Commission and the Alberta Human Rights Tribunal implement the grievance and dispute mechanisms of the Alberta Human Rights Act. The Commission investigates and conciliates formal complaints of discrimination filed under the Act. These complaints may be about work conditions. The Alberta Ministry of Jobs, Economy and Trade (MJET) regulates employment in the province, including the forest industry under the Alberta Employment Standards Code. The Ministry provides information on the website about submitting a complaint, filing an anonymous tip and appealing a decision; and implements a complaint resolution process. Trade unions, where they exist, would generally be the first recourse for resolving grievances and disputes in the workplace. Collective agreements include clauses for dispute resolution. The Alberta Labour Relations Code establishes the Alberta Labour Relations Board, which acts as an independent and impartial tribunal on issues related to labour in the province. The Board is established to, amongst other tasks, hear grievances that cannot be resolved between unions and employers. A company's human resources department would likely have additional mechanisms for resolving grievances and disputes.</p> <p>The Alberta Human Rights Commission reports on outcomes publicly in an annual report published on the Commission's website. The Alberta Human Rights Tribunal publishes all decisions on the Tribunal's website and the Canadian Legal Information Institute website. MJET oversees the Employment Standards Code and maintains an anonymous tip line that is publicly available where anyone can report suspected violations with the Code. No public reporting on outcomes for the Ministry relative to workplace grievances</p> |

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|                                     | <p>were found. Ministry decisions may be referred to the Alberta Labour Relations Board. No mechanism for oversight of resolving grievances and disputes was found at the trade union level.</p> <p>The Alberta Labour Relations Board reports on outcomes publicly in an annual report and publishes all decisions on both the Board website and the Canadian Legal Information Institute website. No mechanism for oversight of resolving grievances and disputes was found at the company level.</p> <p>In the Alberta Human Rights Commission 2021/2022 annual report (the last report available as of September 2023), the Commission reported having received 9,016 inquiries, of which 2,028 were potential complaints, and of those 1,040 formal complaints were accepted. 70% of complaints were related to employment. Over the course of the reporting period, the Commission closed 1,118 complaints (the annual report does not specify but it is assumed that some of the closed cases were carried over from the previous period). No separate reporting mechanism was found for the Human Rights Tribunal. MJET does not report on the number of complaints received or resolved.</p> <p>Trade unions do not publicly report on the effectiveness at resolving grievances and disputes. The Alberta Labour Relations Board receives and resolves hundreds of grievances annually. In 2022/23 Case Resolution by Category Report (the last report available as of September 2023), the Board reported having 566 open cases at the beginning of the annual period, receiving 687 and concluding 663. Companies do not publicly report on the effectiveness of internal processes for resolving grievances and disputes. An internet review completed in September 2023 does not indicate that there is a systemic issue in Alberta with the mechanisms for resolving grievances and disputes.</p> <p><b>Risk conclusion and justification</b></p> <p>There is a comprehensive regulatory framework of mechanisms for the resolution of grievances and disputes. The mechanisms for resolving grievances and disputes are being implemented and there is no evidence of the mechanisms being ineffective at resolving grievances or disputes in the forest sector. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Company human resources policies/procedures</li> <li>• Company grievance/dispute procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Company records of grievance/dispute outcomes</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>  |

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| <p><i>Evidence reviewed</i></p> | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Canadian Labour Congress. <a href="#">Chapters.</a></li> <li>• Canadian Legal Information Institute. <a href="#">Homepage.</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Human Rights Act.</a></li> <li>• <a href="#">Employment Standards Code.</a></li> <li>• <a href="#">Labour Relations Code.</a></li> <li>• Alberta Human Rights Commission. <a href="#">Homepage.</a></li> <li>• Alberta Human Rights Commission. <a href="#">Tribunal.</a></li> <li>• Alberta Human Rights Commission. <a href="#">Resources.</a></li> <li>• Alberta Human Rights Commission. <a href="#">2023 Decisions.</a></li> <li>• Alberta Human Rights Commission. <a href="#">Annual Report.</a> 2021/22.</li> <li>• Alberta Human Rights Commission. <a href="#">Tribunal – review of the Director’s dismissal.</a></li> <li>• Government of Alberta. <a href="#">Collective Bargaining Agreements.</a></li> <li>• Government of Alberta. <a href="#">Employment Standards.</a></li> <li>• Alberta Labour Relations Boards. <a href="#">Homepage.</a></li> <li>• Alberta Labour Relations Board. <a href="#">Annual Reports.</a></li> <li>• Alberta Labour Relations Board. <a href="#">Case Resolution by Category.</a> 2022/23.</li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Provincial <b>Low Risk</b></p>   |
| <p><b>4.1.10</b></p>            | <p><b>Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land<br/>Private Land</p> <p><b>Analysis</b><br/>Systems of training, monitoring, and mandatory use of protective equipment are some of the measures taken to improve occupational health and safety. In Canada, federal legislation covers federally regulated workers, while the provinces develop and manage health and safety infrastructure for other workers, which includes forest workers. Worker training related to occupational health and safety will be described in this Indicator. See Indicator 4.1.8 Training to Workers for all other forest worker training.</p>   |

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Health and safety is important for ensuring the well-being of workers. Workers in an unsafe and unhealthy environment will increase lost time. An effective health and safety program reduces costs and liabilities that firms would incur associated with accidents and the result of following unsafe practices.

### International

The International Labour Organization (ILO) has over 40 different occupational health and safety instruments. There are three primary conventions to note:

- (ILO) Convention C187 – Promotional Framework for Occupational Safety and Health Convention (2006, ratified 2011). Canada is a signatory.
- Convention C148: Working Environment (Air Pollution, Noise, Vibration) from 1977. As of 2021, Canada has not ratified.
- Convention C155: Occupational Health and Safety Convention from 1981. As of 2021, Canada has not ratified.

### Federal

- Canadian Labour Code Part II and Regulations
- Hazardous Products Act

### Provincial

- Alberta Occupational Health and Safety Act
- Workers Compensation Act
- Occupational Health and Safety Code
- Occupational Health and Safety Regulation

## **Enforcement and monitoring**

### International

The ILO website states “The ILO develops international labour standards in the field of safety and health at work to guide governments in setting national laws and regulations and enforcing their application at the workplace. Employers and workers and their organizations also have the framework to improve working conditions and occupational safety and health.”

### Provincial

The Alberta Ministry of Jobs, Economy and Trade (MJET) is responsible for the governance of the Alberta Occupational Health and Safety Act, Occupational Health and Safety Regulation, and Occupational Health and Safety Code are the primary pieces of legislation that define health and safety requirements for the province. All Alberta employers must comply with this legislation. The Alberta Worker Compensation Act provides the legal framework for the administration of the workplace injury and illness prevention and requires employees be trained and function in a safe work environment. The Worker Compensation Act is administered by the Workers’ Compensation Board of Alberta (WCB Alberta), a collaborative board between MJET and the Labour Program Canada. WCB Alberta maintains the informational website; collects premiums from employers; accepts applications from employees who are made ill or injured on the job; and liaises with workers throughout the process of recovery and return to work.

The Alberta Occupational Health and Safety Act requires employers with 20 or more regularly employed workers to have a health and safety program. Employers with fewer than 20 regularly employed workers are not required to have a program but must have documentation in place that meets the requirements established by the Occupational Health and Safety Act, Regulation and Code. This includes assessment and control of workplace hazards and an emergency response plan. Employers have flexibility to develop programs that best suit the workplace, but the Act describes the minimum content of the program. Individuals who operate in an industry that’s required to have workers’ compensation coverage must be registered with WCB Alberta. The definition of a worker includes any full-time, part time, temporary and casual worker, unpaid

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help, family members, and subcontractors operating without their own WCB Alberta coverage. Registration to WCB Alberta is not required for exempt activities, as well as small employers (five or fewer workers) for farming activities.

The Alberta Forest Products Association (AFPA) is a non-profit association that represents Alberta's forest industry. The AFPA sets standards, and supports, develops and connects members with health and safety guidance, resources, training, and events. The AFPA works closely with the WCB Alberta, the Industry Task Force Association, and other agencies on health and safety issues.

Forestry training courses are offered by AFPA and through industry organisations. Examples include:

- Wildlife awareness;
- Vehicle training;
- Supervisor training.

MJET develops mandatory courses, such as the first aid course, provides education and training, and issues permits and certificates. Through MJET, a Small Employers Certificate of Recognition (SECOR), or regular Certificate of Recognition (COR) is awarded to employers who develop health and safety programs that meet established standards. SECOR certification is for small employers with up to 10 employees. SECOR and COR ensures a minimum standard of safety in all forestry workplaces. Companies who SECOR or COR are required to maintain safety programs that are annually audited to verify compliance. Companies must attain one of these recognitions prior to conducting work for forestry companies who request it. The AFPA is a certifying partner authorised to administer the SECOR and COR programs to Alberta employers. The AFPA provides training and auditing resources, including quality assessments, and jointly with MJET issues SECOR and COR certificates to employers. Companies manage the SECOR or COR certification safety program and third parties are hired to conduct annual maintenance or recertification audits.

Alberta Occupational Health and Safety officers have authority to enforce the Occupational Health and Safety Act and relevant Regulations through conducting work site inspections of the workplace of registered WCB Alberta companies. MJET has the legislative authority to issue penalties, violation tickets or orders. Occupational health and safety concerns can be reported through a whistle-blower process. There is an Employers Records Database on the MJET website, which has searchable information about all employers insured by Alberta's Workers' Compensation Board. All occupational health and safety related enforcement actions, including administrative penalties, orders and convictions issued against employers are publicly available in the Employers Records Database.

WCB Alberta rates are set based on performance, with fewer claims resulting in a lower rate for a company. WCB Alberta registered companies monitor occupational health and safety programs through internal tracking systems, internal audits, audits of suppliers and contractors and voluntary third-party audits.

A third-party auditor is hired by the SECOR or COR certified employer to audit the employer's safety program, followed by annual audits to maintain certified status. Companies who work on Crown land must be WCB Alberta registered. Statistics are publicly available on the Alberta government occupational health and safety webpage. In 2022, the agriculture and forestry sector workplace injury and illnesses claim rate was 2.49 per 100 (a decrease of 9% from 2021). The agriculture and forestry sector had the highest fatality claim rate for the past three years (17.27 per 100,000 person-years in 2022). Statistics for forestry alone were not available and so it is not possible to evaluate how the safety record in forestry compares with other sectors. Convictions under the Occupational Health and Safety Act and Regulation in Alberta from 2010 to 2024 are publicly available. There was one conviction against a sawmill in 2023, one conviction against a contractor in 2020, and one conviction against a lumber company in 2018. The MJET database contains publicly available occupational health and safety contravention results at a company level; however, there is no summary roll up for all companies. The clearance status of any company registered with WCB Alberta is publicly available. There is a public listing of SECOR and COR certified companies on the government of Alberta website that is updated daily. As of March 2024, there is no publicly available results to verify health and safety outcomes for non-WCB Alberta registered companies who undertake harvesting or other forest operations.

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|                                     | <p><b>Risk conclusion and justification</b></p> <p><u>Provincial</u><br/>Alberta has closely regulated, controlled, and enforced occupational health and safety laws and regulations. It is concluded that appropriate health and safety safeguards are in place for WCB Alberta registered companies.</p> <p><u>Crown Land</u><br/>The majority of companies who harvest on Crown land are WCB Alberta registered. As such, are required to follow WCB Alberta rules. MJET conducts audit and site visits to ensure these companies are compliant. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.</p> <p><u>Private Land</u><br/>As private land in Alberta is owned by individuals or small businesses, there is no requirement to be WCB Alberta registered. Due to a lack of evidence to support implementation mechanisms, a monitoring framework and/or results to verify safeguards are in place to protect the health and safety of workers, this Indicator is designated as specified risk for private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Company human resources policies/procedures</li> <li>• Company Health &amp; Safety programs/procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• WorkSafe Records/Statistics</li> <li>• Company health &amp; safety records</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interviews with trade unions</li> <li>• Interviews with workers</li> </ul>   |

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| <i>Evidence reviewed</i> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• ILO <a href="#">Occupation Health</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Canadian Labour Code Part II</a> and regulations</li> <li>• <a href="#">Hazardous Products Act</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Occupational Health and Safety Act</a></li> <li>• <a href="#">Occupational Health and Safety Regulation</a></li> <li>• <a href="#">Occupational Health and Safety Code</a></li> <li>• <a href="#">Traffic Safety Act</a></li> <li>• <a href="#">Dangerous Goods Transportation and Handling Act</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">WCB Alberta Website</a></li> <li>• <a href="#">Report an OHS concern   Alberta.ca</a></li> <li>• <a href="#">Convictions under the OHS Legislation   Alberta.ca</a></li> <li>• <a href="#">Workplace Injury, Illness and Fatality Statistics - Alberta.ca</a></li> <li>• <a href="#">Workers' Compensation Board – Alberta Annual Reports</a></li> <li>• <a href="#">Find Employers with a COR</a></li> <li>• <a href="#">COR Program - AFPA</a></li> <li>• <a href="#">Health &amp; Safety Resources – AFPA</a></li> </ul> |
| <i>Risk rating</i>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>  |

### Criterion 4.2 – Feedstock sourcing benefits communities

|                 |   |
|-----------------|---|
| <b>4.2.1</b>    | <b>Negative social and community impacts shall be identified and avoided.</b>         |
| <i>Findings</i> | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b></p> |

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The intent of this Indicator is to promote sustainable and responsible practices that benefit individuals and communities. Sustainable forestry practices must take into account the needs and rights of local communities, protect ecosystems and biodiversity, and support local livelihoods and economies. Elements of this Indicator are discussed and assessed in the following indicators:

- Biodiversity, ecosystem productivity and function are described across Criterion 2.1 and 2.2;
- Labour rights are described across Criterion 4.1;
- Contributions to the local economy are described in Indicator 4.2.2 Positive Contribution to Local Community;
- Indigenous, rights, consultation and cultural heritage are described in Indicators 4.2.4 Legal, Customary & Traditional Tenure & Use Rights, 4.2.6 Consultation/Accommodation, and 4.2.7 Designated Cultural Heritage Sites Preserved, respectively; and
- Forestry grievances and disputes are described in Indicator 4.2.5 Grievance & Dispute Mechanisms - Forestry.

Consultation and requirements and processes specific to Indigenous peoples are discussed in Indicators 4.2.4 Legal, Customary & Traditional Tenure & Use Rights, 4.2.6 Consultation/Accommodation, and 4.2.7 Designated Cultural Heritage Sites Preserved. Grievances and dispute mechanisms related to tenure and use rights and forest management practices are discussed in Indicator 4.2.5 Grievance & Dispute Mechanisms – Forestry. The focus of this Indicator is to ensure that the identification and avoidance of negative social and community impacts are incorporated into forest management planning through a consultation process with stakeholders who may be impacted.

Negative impacts to communities may occur if sustainable and responsible forestry management are not conducted, including loss of tenure and use rights, loss of access to areas with cultural, social, heritage, and economic values used by communities, loss of employment and economic opportunities, health and welfare impacts on communities, and loss of adequate access for recreation.

### Provincial

- Alberta Land Stewardship Act (ALSA)

### Crown Land

- Forests Act

### Private Land

On private land, there is no regulatory framework that requires the identification and avoidance of negative social and community impacts.

## **Enforcement and monitoring**

### Provincial

The Alberta Land Stewardship Act (ALSA) is the governing legislation for regional land-use planning in Alberta and is administered by the Ministry of Environment and Protected Areas (MEPA). The Land-Use Framework focuses on managing public and private lands and natural resources to achieve Alberta's long-term economic, environmental, and social goals. The Land-Use Framework establishes seven land-use regions in the province of Alberta. Under ALSA, public consultation is a legal requirement during the development phase of regional plans. Consultation types include information sessions or workshops.

### Crown Land

The Alberta Ministry of Forestry and Parks (MFP) and the Aboriginal Consultation Office are the agencies responsible for ensuring consultation processes occur. Regional Landscape Assessments are available for each Forest Management Plan (FMP), as outlined in the Alberta Forest Management Planning Standard (AFMPS). Forest Management Agreement (FMA) holders incorporate the Regional Landscape Assessment information into FMPs as plans are updated or replaced for each FMA. There are currently six

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Regional Landscape Assessments on the Alberta government website. FMPs are prepared either by MFP or by forest companies on Crown land and guidance is provided in the AFMPS. FMP developers must inform and invite the public to be involved in the development of FMP. FMPs must focus on how forestry activities will be managed to reduce negative impacts on other resource users and resource values. Throughout FMP implementation, timber disposition holders are required to maintain efforts to conduct meaningful public and interest group involvement through:

- Open houses within communities;
- Presentations and information on the disposition holder's website;
- Public advisory committees;
- Town hall meetings.

General Development Plans have a component of consultation, as per requirements in the Alberta Timber Harvest Planning and Operating Ground Rules (OGR). General Development Plans ensure issues and concerns are addressed early in the operational planning process. Timber disposition holders are required to manage the implications of forest management activities on forest recreation and designated trails at the operational site level as per OGR requirements. General Development Plans and Annual Operating Plans (AOPs) are made available for public review on an annual basis.

Timber disposition holders are required to report results in Stewardship Reports. There are three values, objectives, indicators and targets (VOITs) which must be reported on related to consultation. The VOITs are protected areas consultation, other use integration, and public involvement.

### Private Land

As of March 2024, there is no publicly available information describing implementation mechanisms related to the identification and avoidance of negative social and community impacts on private land.

### Provincial

Approved land-use regional plans governing agencies include the Crown and local government bodies. Indicators have been developed for broad economic, environmental, and social outcomes dependent on regional outcomes. A non-compliance with a regional plan can be filed with the Land Use Secretariat. The non-compliance will be referred to the appropriate government department and/or a local government body, depending on the nature of the non-compliance.

### Crown Land

MFP is responsible for reviewing and approving FMPs, General Development Plans and AOPs submitted by timber disposition holders. Consultation information from the FMP and General Development Plan are provided to MFP to ensure adequate consultation. MFP either approves or makes recommendations to the timber disposition holder for the FMP and General Development Plan, prior to approval. Stewardship Reports describe the monitoring program and how well the objectives of the FMP are being met, including VOITs. Timber disposition holders are required to submit Stewardship Reports to MFP every five years. MFP is responsible for reviewing and approving Stewardship Reports. Stewardship Reporting results are publicly available. Stewardship Report results are shared with the public advisory committees for review and comments.

### Private Land

As of March 2024, there are no publicly available results to verify the current condition related to the identification and avoidance of negative social and community impacts on private land.

### Provincial

The Alberta land-use regional plans are a legal requirement for both Crown and private lands in Alberta. The goal of the Land-Use Framework is to manage public and private lands and natural resources to achieve Alberta's long-term economic, environmental and social goals. Currently, there are only two of seven land-use

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|                                     | <p>regional plans approved in the province. Summaries of public and stakeholder consultations are found on Alberta’s land- use website under publications. An interactive land-use framework progress reporting portal is publicly available and demonstrates progress made towards regional and provincial objectives and outcomes.</p> <p><u>Crown Land</u><br/>Through public advisory committees and other acceptable forms of consultation in the FMP process, General Development Plan consultation requirements, and Stewardship Report reporting requirements, the identification and avoidance of negative social and community impacts is occurring on Crown land. The stewardship reporting VOIT results must identify the number of consultations, forms and values discussed, and how issues were addressed. Timber disposition holders cannot operate without the approval from MFP on FMPs, Stewardship Reports, General Development Plans or AOPs.</p> <p><u>Private Land</u><br/>Private land is managed at the landowner’s discretion. As of March 2024, there are no publicly available results to verify the current condition related to the identification and avoidance of negative social and community impacts on private land.</p> <p><b>Risk conclusion and justification</b></p> <p><u>Crown Land</u><br/>There is a comprehensive legal framework with appropriate controls governing consultation requirement during forest management planning on Crown land. Consultation to identify and avoid negative social and community impacts is required prior to plan approval. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.</p> <p><u>Private Land</u><br/>Due to a lack of a legislative framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of negative social and community impacts, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in Alberta.</p> |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures</li> <li>• Consultation/engagement process</li> <li>• Grievance/dispute resolution mechanisms</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Consultation/engagement notices, opportunities, meeting minutes, records, and applicable outcomes</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with local government, community members, special interest groups/organisation</li> </ul>  |

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| <p><i>Evidence reviewed</i></p> | <p>Provincial</p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Land Stewardship Act</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">LUF Publications and Forms</a></li> <li>• <a href="#">Regional Landscape Assessments</a></li> <li>• <a href="#">Alberta Forest Management Planning Standard</a></li> <li>• <a href="#">Forest Management Planning Standard Bulletin: Stewardship Reporting Requirements</a></li> <li>• <a href="#">Alberta Timber Harvesting and Planning Operating Ground Rules</a></li> <li>• <a href="#">Implementation Progress and Results Reporting - Land-use Framework Regional Plans</a></li> <li>• <a href="#">Land-use Framework Progress Reporting</a></li> <li>• <a href="#">About forest tenure in Alberta webpage</a></li> </ul>  |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>  |
| <p><b>4.2.2</b></p>             | <p><b>Feedstock sourcing shall positively contribute to the local economy, including employment.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Provincial</p> <p><b>Analysis</b></p> <p>The forest sector in Alberta is highly integrated, roughly balanced between softwood lumber and pulp and paper. The wood pellet industry utilises the by- product (sawmill and harvest residuals) of the rest of the forest sector. There are five wood pellet mills in Alberta, four are located in the Athabasca-Grande Prairie-Peace River economic region and one in the Edmonton region. The forest sector is defined using Statistics Canada’s Input-Output Industry Classification. The Classification does not distinguish wood pellet operations from other forest section operations, rather they are included in the overall numbers. For this Indicator, there are three subsectors:</p> <ul style="list-style-type: none"> <li>• Forestry, logging and support subsector are activities in the forests. This includes the Input-Output Industry Classification forestry and logging (BC113000) subsector and the support activities for the forestry (BS115300) subsector.</li> <li>• Wood products manufacturing subsector is activities in the solid wood products mills (which includes pellet mills). This includes the Input-Output Industry Classification subsectors sawmills and wood preservation (BS321100), veneer, plywood and engineered wood product manufacturing (BS321200), and other wood product manufacturing (BS321900).</li> <li>• Pulp and paper manufacturing subsector are activities in pulp and paper manufacturing. This includes the subsectors pulp, paper, and paperboard mills (BS322100) and converted paper product manufacturing (BS322200).</li> </ul> <p>See Section 4.8 for an Overview of the Biomass Sector. This Indicator is also tied to Indicators 1.1.4 Payments – Harvest Rights, Royalties and 2.2.9 Long- Term</p> |

Production Capacity. See Indicator 3.3.1 Principles of Cascading Use for the integration of the forest products industry.

The primary threats from inadequate contributions to the local economy include:

- Poor wages and inadequate benefits for workers and contractors;
- Reduced employment;
- Unfair return for timber values;
- Lower purchasing power resulting in reduced strength of local businesses.

In Alberta, there are no specific legislative requirements that directs economic contributions from the forest industry to local communities.

### **Enforcement and monitoring**

There is no implementing mechanism that directs economic contributions from the forest industry to local communities.

The Alberta Forest Products Association engaged PricewaterhouseCoopers (PWC) to conduct the Economic and Supply Chain Analysis of the Alberta Forest Sector, published in 2022 with 2020 data. There are approximately 31,573 jobs in Alberta related to the forest products industry (16,565 direct, 8,800 indirect, 6,208 induced). In 2020, 7,646 (4,360 direct, 1,879 indirect, 1,407 induced) were employed in forestry, logging and support. 18,301 were employed in the wood products and manufacturing industry, which includes wood pellet mills (10,065 direct, 4,742 indirect, 3,494 induced). 5,625 were employed in the pulp and paper manufacturing industry (2,140 direct, 2,179 indirect, 1,306 induced). Total labour income from the Alberta forest industry in 2020 was \$2.7 billion (\$1.6 billion direct, \$724.1 million indirect, \$335.4 million induced). \$625 million (\$398.8 million direct, \$152.3 million indirect, \$73.8 million induced) from forestry, logging and support. \$1.48 billion (\$ 925.6 million direct, \$368.0 million indirect, \$185.7 million induced) from the wood products manufacturing industry. \$594.6 million (\$315.0 million direct, \$203.8 million indirect, \$75.8 million induced) from the pulp and paper manufacturing industry.

In 2020, forest sector wages were higher than the Canada-wide industrial aggregate average compensation (\$62,451 in Alberta, compared to \$57,024 Canada-wide).

There was \$13.6 billion in output (\$9.2 billion direct, \$3.0 billion indirect, 1.4 billion induced). \$2.5 billion from forestry, logging and support (\$1.5 billion direct, \$705.4 million indirect, \$295.9 million induced). \$7.5 billion from the wood products manufacturing industry (\$5.3 billion direct, \$1.4 billion indirect, \$762.5 million induced). \$3.7 billion from pulp and paper manufacturing industry (\$2.4 billion direct, \$920.4 million indirect, \$341.4 million induced). There was \$5.8 billion in gross domestic product (GDP) from the forest products industry (\$3.4 billion direct, \$1.5 billion indirect, \$868.5 million induced). \$1.1 billion from forestry, logging and support (\$607.6 million direct, \$333.1 million indirect, \$183.8 million induced). \$3.2 billion from the wood products manufacturing industry (\$2.1 billion direct, \$706.6 million indirect, \$473.4 million induced). \$1.4 billion from the pulp and paper manufacturing industry (\$726.6 million direct, \$461.3 million indirect, \$211.4 million induced).

Of the total GDP contributed and facilitated by the Alberta forest sector, 56% was driven by the wood product manufacturing industry, 24% by pulp and paper manufacturing, and 20% forestry, logging and support. From 2015 to 2020, the Alberta forest sector invested approximately \$1.8 billion in construction, machinery and equipment expenditures, and approximately \$2 billion in repairs and maintenance. There was \$988 million in provincial taxes and royalties (\$740.6 million direct, \$148.8 million indirect, \$98.8 million induced) in addition to \$100 million paid in dues and levies to the Forest Resources Improvement Association of Alberta. From 2016 to 2020, Alberta forest companies invested over \$90 million in R&D through a combination of in-house and secondary provider initiatives. From 2016 to 2020, Alberta forest companies invested over \$12 million in donations to community causes and organizations. From 2016 to 2020, the Alberta forest sector spent approximately \$2.5 billion on local suppliers. In the Athabasca-Grande Prairie-Peace River region, where four wood pellet mills are located, it is estimated in 2020 the forest sector contributed approximately \$4.3 billion in output, \$1.6 billion to the region's GDP, \$693.1 million in labour income with 6,687 people employed. In the Edmonton region, where one pellet mill is located, it is estimated in 2020 the forest sector contributed \$2.9 billion in output, \$1.3 billion to the region's GDP, \$648.7 million in labour income with 8,285 people employed.

## Annex 1 Detailed findings for Supply Base Evaluation

|                              |   |
|------------------------------|---|
|                              | <p><b>Risk conclusion and justification</b></p> <p>There is a highly integrated forest products industry in Alberta. Biomass-related activities contribute to local economies for outputs, GDP, local employment and local capital investment. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in Alberta.</p>   |
| <i>Means of verification</i> | <ul style="list-style-type: none"> <li>• Company policies/procedures for employment, procurement and contributions within the local economy</li> <li>• Regional and/or sectoral analysis reports and economic studies</li> <li>• Company records of economic contributions to local economy</li> <li>• Workforce/employment records</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with local government, business, workers, community members, special interest groups/organisation</li> </ul>   |
| <i>Evidence reviewed</i>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Economic and Supply Chain Analysis of the Alberta Forest Sector</a>, Alberta Forest Products Association, 2022</li> <li>• <a href="#">Alberta Economic Regions</a>, Government of Alberta</li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Wood Pellet Location Map</a>, Wood Pellet Association of Canada</li> </ul>  |
| <i>Risk rating</i>           | Provincial <b>Low risk</b>  |
| <b>4.2.3</b>                 | <b>Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced.</b>  |
| <i>Findings</i>              | <p><b>Scale of assessment</b></p> <p>Crown Land, Private Land</p> <p><b>Analysis</b></p> <p>This Indicator assesses the impacts on the ability of rural communities, both Indigenous and non-Indigenous, to meet basic needs. Sustainable Biomass Program's (SBP) glossary defines basic necessities as "Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples. A site or resource is fundamental for satisfying basic necessities if the services it provides are irreplaceable (i.e., if alternatives are not readily accessible or affordable), and if its loss or damage would cause serious suffering or prejudice to affected stakeholders. Basic necessities in the context of HCV 5 may cover any or all of the provisioning services of the environment including tangible materials that can be consumed, exchanged or used directly in manufacture, and which form the basis of daily life." Forests, on a daily basis provide both food and drinking water. Food from forests typically falls into two categories: hunting/fishing (ungulates, freshwater, and anadromous fish) and foraging (mushroom, berry, and herbaceous plant collection). Drinking water supply is from surface water (lakes and rivers), as well as sub-surface ground water. Impacts on the rights of Indigenous communities, including hunting, fishing, and gathering are considered in Indicator 4.2.4 Legal, Customary, and Traditional Tenure &amp; Use Rights and Indicator 4.2.6 Consultation/Accommodation. Negative</p> |

## Annex 1 Detailed findings for Supply Base Evaluation

impacts on non-Indigenous communities are considered under Indicator 4.2.1 Negative Social & Community Impacts ID & Avoided. Maintaining ecosystem functions and services of water resources is considered under Indicator 2.2.5 Water Quality/Quantity Maintained or Enhanced. The protection of drinking water via watershed protection and water licensing is the focus of this Indicator.

Forestry operations and related activities can potentially have a negative impact on the quality or quantity of the local or community water supply, negatively affecting the health and quality of life of water users.

### Provincial

- Water Act
- Environmental Protection and Enhancement Act (EPEA)
- Forests Act
- Timber Management Regulation

### **Enforcement and monitoring**

#### Provincial

The Water Act and Environmental Protection and Enhancement Act (EPEA) protects drinking water in Alberta. The Ministry of Environment and Protected Areas (MEPA) has authority to administer the Water Act and EPEA. The Water Act is the regulatory instrument for water source protection, as well as the use and allocation of water through licensing. A wide range of permits, licences, authorisations, and certificates are required under the Water Act for activities including water use allocations such as water licensing and temporary diversion approvals. Authorisation from MEPA is required for activities that may affect the land or vegetation around a water body. The strategy Water for Life: Alberta's Strategy for Sustainability, issued under the authority of the Water Act, is intended to ensure the proper management of water in Alberta for "safe and secure drinking water."

Water management plans are developed under the Water Act and approved by MEPA. Water management plans are guidance for minimum in-stream flows, conditions on water diversions, and strategies for the protection of the aquatic environment. Watershed Planning and Advisory Councils prepare Integrated Watershed Management Plans, which are non-regulatory and have no statutory authority. The Integrated Watershed Management Plans are used to provide management advice to government and agencies responsible for developing policy and approvals in Alberta and are prepared for one of eleven watersheds in the province. The Water Act and EPEA is applicable on Crown land and private land.

#### Crown Land

The Ministry of Forests and Parks (MFP) has authority to administer the Forests Act and Timber Management Regulation. The Timber Management Regulation, stipulates that harvesting activities on Crown land must be conducted "in a manner that does not impede the natural flow of water in any watercourse or contaminate or pollute any river, stream, lake, well or other body or source of water." The Alberta Forest Management Planning Standards (AFMPS) details Forest Management Plan (FMP) and Stewardship Reporting requirements through values, objectives, indicators and targets (VOITS) for water yields and watershed modelling. FMP requirements include the protection of watersheds, completed through watershed modelling and analysis, which determines an acceptable target for water yield increase following harvesting. Harvesting impacts on water yield are to be predicted in the FMP. Timber harvesting impacts must be limited on water yields; the targets are zero Water Act penalties and compliance with FMP. The Alberta Timber Harvesting and Planning Operating Ground Rules (OGR) identify standards to which timber disposition holders must adhere to; however, there are no ground rules specific to the protection of human drinking water.

#### Private Land

## Annex 1 Detailed findings for Supply Base Evaluation

Private land owners are to follow the provincial requirements in the Water Act and EPEA. Private land owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing implementation mechanisms for the protection of human drinking water on private land.

### Provincial

MEPA monitors compliance to the Water Act, EPEA, and conducts compliance and enforcement for water quality infractions for Crown land and private land in Alberta. The majority of proactive inspections under MEPAs compliance assurance program are focused on municipal drinking water systems. Approved water management plans (under the Water Act) are used by MEPA when making water licence and approval decisions. There are multiple information and reporting lines for complaints or violations regarding water in Alberta. MEPA responds to complaints.

### Crown Land

Timber disposition holders are required to produce Stewardship Reports reported every five years. Under the water quantity value, Stewardship Reports include reporting of area harvested compared with planned harvest area, to ensure harvesting activities have not negatively impacted water yields.

### Private Land

MEPA conducts monitoring on private land. As of March 2024, there is no publicly available information describing an oversight or monitoring program for the protection of drinking water on other private land. MEPA Compliance and Assurance Annual Reports indicate there were 139 proactive inspections in 2020/2021, and 418 proactive inspections in 2019/2020 conducted related to surface water, ground water, water distribution, and industrial infrastructure. The annual reports do not distinguish between Crown land and private land or industry type. Enforcement actions are publicly available on the MEPA website. The type of contravention to the Water Act and EPEA are not specified. There are five water management plans approved under the Water Act in Alberta, which are to be considered by MEPA when approving water licences.

There are 11 Watershed Planning and Advisory Councils in Alberta representing the major river basins. The Watershed Planning and Advisory Councils have individual publicly available websites, which include information on the status of the respective watershed.

### Crown Land

MFP Forest Operations Monitoring Program data verified timber disposition holders were compliant with water related legislation; the results are not specific to the protection of drinking water.

### Private Land

MEPA results include private land, but the annual reports do not distinguish between Crown land and private land. As of March 2024, there are no publicly available results verifying the current condition of the protection of human drinking water on private land.

### **Risk conclusion and justification**

#### Crown Land and Private Land

There is a regulatory framework and implementation mechanisms for the protection of drinking water. MFP and MEPA monitoring through compliance assurance, and annual reporting verifies the protection of drinking water is occurring on Crown land and private land. Based on evidence reviewed, this Indicator is designated as low risk for Crown land and private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |  |
|-------------------------------------|--|
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures</li> <li>• Consultation/engagement process</li> <li>• Grievance/dispute resolution mechanisms</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Consultation/engagement notices, opportunities, meeting minutes, records, and applicable outcomes</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Supplier verification program</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with local government, community members, special interest groups/organisation</li> <li>• Interview with experts</li> </ul> |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Environmental Protection and Enhancement Act</a></li> <li>• <a href="#">Water Act</a></li> <li>• <a href="#">Alberta Water Act Fact Sheet</a></li> <li>• <a href="#">Watershed Planning and Advisory Councils</a></li> <li>• <a href="#">Guide to Watershed Management Planning in Alberta</a></li> <li>• <a href="#">Water Management Plans</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">MEPA Compliance Assurance Annual Reports (2018-19 to 2020-21)</a></li> <li>• <a href="#">MEPA Enforcement Actions Quarterly Reports</a></li> <li>• <a href="#">Facts About Water in Alberta</a></li> <li>• <a href="#">Water for Life: Alberta's Strategy for Sustainability</a></li> </ul>  |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

|          |   |
|----------|---|
| 4.2.4    | <p><b>Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.</b></p>  |
| Findings | <p><b>Scale of assessment</b><br/>Crown Land<br/>Private Land</p> <p><b>Analysis</b><br/>Sustainable Biomass Program's (SBP) glossary defines customary rights as "Rights that arise from a behaviour or act that is repeated over time under the belief that it is obligatory and due to repetition and acceptance, acquire the force of law within a geography or society (also known as customary law)." Cornell University's Faculty of Law defines customary and traditional use as a "means a long-established, consistent pattern of use, incorporating beliefs and customs which have been transmitted from generation to generation." SBP defines respected as "being mindful of and appropriately considering the rights of Indigenous Peoples."<br/>SBP's glossary does not define traditional tenure or use rights. This Indicator evaluates if Indigenous rights have been identified, documented and respected. In Alberta, Indigenous Peoples identify as First Nations, Métis, Inuit or multiple Indigenous ethnicities. The collective term is Indigenous Peoples unless stated otherwise. This Indicator is assessed from the perspective of Indigenous Peoples/communities. Indicator 4.2.1 Negative Social &amp; Community Impacts ID &amp; Avoided, which covers similar topics, was evaluated from the standpoint of non-Indigenous communities. Indicator 4.2.6 Consultation/Accommodation demonstrates whether there is a consultation process and, if necessary, an accommodation process. Indicator 4.2.7 Designated Cultural Heritage Sites Preserved demonstrates the protection of cultural heritage sites identified and designated. Section 4.3 provides an overview of Indigenous Peoples in Alberta.<br/>Negative impacts include the possibility that customary and traditional tenure and use rights may not be identified or only partially identified. This could lead to the unidentified rights being violated or becoming a source of contention. Another threat is that identified rights are not documented. For example, rights may be identified in court but if the documentation of these rights is insufficient to reach relevant practitioners, the rights may not be respected. Rights that the courts have not identified may not be respected. Rights that are identified and appropriately documented may not be respected. These potential scenarios could lead to violations of legal, customary, and traditional tenure and use rights.</p> <p><u>International</u></p> <ul style="list-style-type: none"> <li>• United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)</li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Constitution Act, 1982</li> <li>• United Nations Declaration on the Rights of Indigenous Peoples Act (UNDRIP Act), 2021             <ul style="list-style-type: none"> <li>• Truth and Reconciliation Commission (TRC)'s Calls to Action</li> </ul> </li> </ul> <p><u>Treaties</u></p> <ul style="list-style-type: none"> <li>• Treaty 4</li> <li>• Treaty 6</li> <li>• Treaty 7</li> <li>• Treaty 8</li> </ul> |

- Treaty 10

These treaties were made between the First Nations and the British Crown, before Alberta was established. All land in Alberta is covered by treaty.

### Provincial

- Métis Settlements Act

### **Enforcement and monitoring**

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and committed to its implementation was endorsed by the Government of Canada in 2016. In addition, The Government of Canada is committed to achieving reconciliation with Indigenous peoples through a renewed, nation-to-nation, government-to-government, and Inuit-Crown relationship based on recognition of rights, respect, co-operation, and partnership as the foundation for transformative change as stipulated in the 10 principles of the Truth and Reconciliation Commission (TRC)'s ( <https://www.justice.gc.ca/eng/csj-sjc/principles-principes.html>) The principle 6 is particularly relevant in the context of the indicator 4.2.4 : *“The Government of Canada recognizes that meaningful engagement with Indigenous peoples aims to secure their free, prior, and informed consent when Canada proposes to take actions which impact them and their rights, including their lands, territories and resources”*

The Constitution Act, 1982, section 35 recognises Indigenous Peoples’ rights and provides legal protection to rights defined after 1982. The federal United Nations Declaration on the Rights of Indigenous Peoples Act (UNDRIP Act), which came into force in June 2021, was established to affirm UNDRIP as an international human rights instrument that can help interpret and apply Canadian law. As of March 2024, Alberta has not passed an equivalent legislation.

The Alberta government has signed separate protocol agreements with three First Nations:

- September 2019, with the Blackfoot Confederacy;
- October 2020, with the Stoney Nakoda-Tsuut’ina Tribal Council;
- December 2020, with the Treaty 6 First Nations.

In 2018, the Métis Nation of Alberta and Canada signed a Consultation Agreement. In 2019, the Métis Government Recognition and Self-Government Agreement was signed between the Métis Nation of Alberta and Canada. In February 2023, Canada and the Métis Nation of Alberta built on the 2019 agreement by signed the Métis Nation within Alberta Self-Government Recognition and Implementation Agreement. In the 2023 agreement, Canada recognised the Métis Nation of Alberta is an Indigenous governing body for the Métis Nation within Alberta and that the Métis Nation within Alberta has the right to self- government. As of March 2024, there is no similar agreement between the Métis Nation of Alberta and the Alberta government. The Métis Settlements Act, passed in 1990, includes governance and administration of the Métis settlements. The Aboriginal Consultation Office in the Alberta Ministry of Indigenous Relations supports the consistent application of policy, process, and best practices. On Crown land, the Aboriginal Consultation Office directs, monitors, and supports the consultation activities of Alberta government ministries, including the Ministry of Environment and Protected Areas (MEPA) and the Ministry of Forestry and Parks (MFP). The Aboriginal Consultation Office’s document The Government of Alberta’s Proponent Guide to First Nations and Métis Settlements Consultation Procedures was released in 2019. See Indicator 4.2.6 Consultation/Accommodation for further information on consultation. Metis Settlements and First Nations are treated the same in terms of consultation. The consultation package prepared during the development of the General Development Plan is sent to both First Nations and Metis Settlements. As of March 2024, there is no publicly available information regarding Indigenous Peoples’ tenure and use rights being asserted on private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

The 2023 Agreement between Canada and the Métis Nation of Alberta is only binding and legally enforceable between the parties. The 2023 Agreement contains languages regarding work together in good faith. There is a dispute resolution clause in the Agreement should an issue arise. If the dispute resolution procedure cannot be resolved, the parties have the option of going to court. The ACO works with MEPA and MFP on consultation activities and supports the consistent application of policy, process and best practices. As of March 2024, there is no publicly available information regarding oversight with respect to Indigenous Peoples' tenure and use rights on private land in Alberta.

Indigenous rights have been affirmed through the federal Constitution Act and UNDRIP Act. These rights are being defined through the court system. Treaties 4, 6, 7, 8, 10 and the Métis Settlements Act define Indigenous rights. The Government of Alberta's Policy on Consultation with First Nations on Land and Natural Resource Management, 2013 (Amended 2020), states that Alberta will consult with First Nations when Crown land and natural resource management decisions may adversely impact Treaty rights protected under the Constitution Act, 1982, as well as traditional uses. The Government of Alberta's Policy on Consultation with Métis Settlements on Land and Natural Resource Management, 2015 (Amended 2020), states that Alberta will consult with Métis Settlements and, where appropriate, accommodate Métis Settlements when Crown decisions may adversely impact Settlement members' harvesting and traditional land use activities. The Aboriginal Consultation Office's document—The Government of Alberta's Proponent Guide to First Nations and Métis Settlements Consultation Procedures (2019) — is in place for consultation procedures. In 2022, the Duncan's First Nation filed a lawsuit against Alberta claiming the cumulative effects of industrial development, agriculture, and settlement activities have significantly infringed on their Treaty 8 rights. The Onion Lake Cree First Nation have filed two statements of claim against Alberta. One in 2022, states the Alberta Sovereignty Within a United Canada Act infringes upon treaty rights and was passed without any First Nations consultation or consideration. The other in 2020, states the Critical Infrastructure Defence Act negates the Nation's treaty right to hunt, fish, trap, and pursue traditional ceremonies. A Beaver Lake Cree First Nation lawsuit against the province in 2008 regarding cumulative effects remains before the courts. The Métis are developing a self-government structure and have a self- government recognition agreement with Canada but not with Alberta. As of March 2024, there is no publicly available information regarding Indigenous Peoples' asserting tenure and use rights on private land.

### **Risk conclusion and justification**

In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the principles of the Reconciliation Strategy, the Government recognizes the right of Indigenous Peoples to participate in decision-making on matters that affect their rights, through their own representative institutions. It also acknowledges the obligation to consult and cooperate in good faith with the aim of securing their free, prior, and informed consent (FPIC). The importance of FPIC, as outlined in the UN Declaration, extends beyond titled lands and encompasses broader issues related to Indigenous rights, governance, and stewardship responsibilities. Therefore, this Indicator is designated as specified risk for Crown land in Alberta. In addition, Indigenous Peoples have not asserted tenure and use rights on private land. As such, this Indicator is also designated as specified risk for private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

### *Means of verification*

- Regulatory framework
- Regulatory agency websites
- Forest management plans
- Best management practices and/or operational procedures
- Consultation agreements
- Grievance/dispute resolution mechanisms
- Regulatory compliance and enforcement data/reports
- Oversight agency database records and/or reports
- Legal, customary & traditional tenure & use rights identified and documented
- Consultation notices, opportunities, meeting minutes, records, and applicable outcomes
- Site plans and/or post-activity inspections demonstrate negative impacts mitigated
- Publicly available information (reports, news & websites)
- Interviews with regulatory/oversight agency
- Interview with Indigenous People
- Interview with experts

## Annex 1 Detailed findings for Supply Base Evaluation

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|---------------------------------|---|
| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">UN Declaration on the Rights of Indigenous Peoples</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution Act, 1982, section 35</a></li> <li>• <a href="#">UN Declaration on the Rights of Indigenous Peoples Act</a></li> <li>• Truth and Reconciliation Commission (TRC)'s Calls to Action</li> <li>• </li> </ul> <p><u>Bilateral</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Métis Government Recognition and Self-Government Agreement, 2019</a></li> <li>• <a href="#">Métis Nation of Alberta and Government of Canada Consultation Agreement, 2018</a></li> <li>• <a href="#">Métis Nation within Alberta Self-Government Recognition and Implementation Agreement, 2023</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Government of Alberta's Policy on Consultation with First Nations on Land and Natural Resource Management, 2013 (Amended 2020).</a></li> <li>• <a href="#">Government of Alberta's Policy on Consultation with Métis Settlements on Land and Natural Resource Management, 2015 (Amended 2020).</a></li> <li>• <a href="#">Métis Settlements Act</a></li> <li>• <a href="#">The Government of Alberta's Proponent Guide to First Nations and Metis Settlements Consultation Procedures. Alberta Consultation Office. 2019.</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Beaver Lake Cree Supreme Court of Canada Ruling, Anderson v Alberta 2021</a></li> <li>• <a href="#">Borrows, John. 2015. Aboriginal Title and Private Property. The Supreme Court Law Review: Osgoode's Annual Constitutional Cases Conference. Vol 71, Article 5.</a></li> <li>• <a href="#">Duncan's First Nation v Alberta. Filed in Court of Queen's Bench of Alberta. Statement of Claim. 18 July 18, 2022.</a></li> <li>• <a href="#">Onion Lake Cree First Nation v Alberta. Filed in Court of King's Bench of Alberta. Statement of Claim. 19 December 2022.</a></li> <li>• <a href="#">Onion Lake Cree First Nation v Alberta. Filed in Court of Queen's Bench of Alberta. Statement of Claim. 16 July 2020.</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Specified risk</b></p> <p>Private Land <b>specified risk</b></p>   |
| <p><b>4.2.5</b></p>             | <p><b>Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.</b></p>   |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b></p> <p>Crown Land, Private Land</p>   |

### Analysis

Grievances and disputes considered under this Indicator are specific to tenure and use rights and forest management practices, each of which is governed by different legislation and measures. This Indicator ensures stakeholders have access to an effective system to raise and remedy grievances and disputes related to tenure and use rights. Consultation processes with stakeholders during forest management planning is discussed in Indicator 4.2.1 Negative Social & Community Impact ID & Avoided. Dispute-related Indicators include Indicator 1.1.2 Legal Ownership & Land Use, Indicator 1.1.4 Payments – Harvest Rights, Royalties and Indicator 4.2.4 Legal, Customary & Traditional Tenure & Use Rights.

It is important to have a system to resolve grievances and disputes relating to tenure and use rights of the forest and other land management practices. Potential impacts include: mechanisms for resolving grievances and disputes may not be mutually agreed upon by all parties involved and are not being documented; the system fails to resolve disputes in an effective, timely, and appropriate manner; and the system does not ensure the anonymity of complainants, community spokespersons and whistle-blowers.

#### Crown Land

- Public Lands Act
- Forests Act

#### Private Land

The Alberta judicial system regulates grievances and disputes regarding private land.

### Enforcement and monitoring

#### Crown Land

The Alberta Ministry of Forestry and Parks (MFP) regulates compliance with the Forests Act and relevant regulations and policy directives. The Alberta Ministry of Environment and Protected Areas (MEPA) is the administrative authority for the Public Lands Act. There are multiple information and reporting lines for complaints regarding Crown land in Alberta. The MEPA responds to complaints. Violations may relate to fire, water, road use, forestry operations or misuse of Crown lands. Companies and individuals are expected to self-report any complaints or disputes. The Forest Management Planning Standard Interpretive Bulletin: Stewardship Reporting, lists three mandatory values, objectives, indicators and targets (VOITs) regarding consultation processes and results in stewardship reporting for timber disposition holders. The VOITs are protected areas consultation, other use integration, and public involvement. The stewardship reporting VOIT results must identify the number of consultations, forms and values discussed, and how issues were addressed. Stewardship reporting is every five years. The Alberta Timber Harvest Planning and Operating Ground Rules (OGR) provide requirements for the General Development Plan. The General Development Plan assist the timber disposition holder in integrating timber operations with other timber disposition holders and forest resource users and ensure that issues and concerns are identified and addressed early in the planning process. The Plan identifies a list of potential stakeholders who are active on the landscape and raised concerns during the engagement phase. General Development Plans are submitted annually to MFP.

#### Private Land

On private land, management is at the discretion of the landowner. The landowner may enter into an agreement with another party to use the timber or land, which is enforceable through contract law within the provincial legal system. Grievances and disputes that arise on private land are conducted through the provincial judicial system.

#### Crown Land

Illegal activity or other enforcement concerns in Alberta can be reported to 310- LAND. The Energy and Environmental Response Line can be called to report complaints about air quality, or water quality or quantity. MFP conducts industry audits and inspections to ensure compliance with the Forests Act and forestry regulations.

## Annex 1 Detailed findings for Supply Base Evaluation

### Private Land

The provincial judicial system provides oversight for grievances and disputes on other private land.

### Crown Land

MEPA publishes publicly available Compliance Assurance Annual Reports.

| Year    | # of Public Land Related Complaints |
|---------|-------------------------------------|
| 2020/21 |                                     |
| 2019/20 |                                     |
| 2018/19 |                                     |
| 2017/18 |                                     |
| 2016/17 |                                     |

MFP Forests Act Enforcement Action Quarterly Reports can be viewed on the Open Government Portal. From 2019 to 2023, there were no contraventions related to disputes of tenure and use rights. MFP reviews and approves General Development Plans and Stewardship Reports.

### Private Land

As of March 2024, there are no publicly available records of complaints for grievances or disputes regarding tenure and use rights on other private land. The judicial system is the mechanism to resolve grievances and disputes resolution on private land.

### **Risk conclusion and justification**

#### Crown Land

Systems and mechanisms are in place to resolve grievances or disputes regarding tenure or use rights on Crown land. There is no indication of widespread or systemic grievances or disputes relating to tenure and use rights of the forest and other land management practices. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.

#### Private Land

The judicial system is the mechanism to resolve grievances and disputes resolution. There is no indication of widespread or systemic grievances or disputes relating to tenure and use rights of the forest and other land management practices. Based on evidence reviewed, this Indicator is designated as low risk for other private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |  |
|-------------------------------------|--|
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Forest management plans</li> <li>• Consultation/engagement process</li> <li>• Grievance/dispute resolution mechanisms</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Grievance/dispute resolution opportunities, meeting minutes, records, and applicable outcomes</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with individual/organisation that initiated the grievance/dispute</li> <li>• Interviews with experts</li> </ul>   |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Forest Management Planning Standard Interpretive Bulletin: Stewardship Reporting Requirements</a> (2017)</li> <li>• <a href="#">Alberta Timber Harvesting Planning and Operating Ground Rules</a> (2023)</li> <li>• <a href="#">Forests Act Contraventions - MFP</a></li> <li>• <a href="#">MEPA Compliance Assurance Annual Reports</a></li> <li>• <a href="#">Report on the 2018 compliance plan for activities on public land</a></li> <li>• <a href="#">MEPA 310-LAND Information and Reporting Line for Crown Land</a></li> <li>• <a href="#">MEPA Energy and Environmental Response Line</a></li> </ul> |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Low risk</b></p>  |
| <p><b>4.2.6</b></p>                 | <p><b>Where Indigenous Peoples’ rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.</b></p>  |
| <p><i>Findings</i></p>              | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>The Sustainable Biomass Program (SBP) defines free, prior and informed consent (FPIC) as “a collective human right of indigenous peoples and local communities to give and withhold their consent prior to the commencement of any activity that may affect their rights, land, resources, territories, livelihoods, and food security. It is a right</p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

exercised through representatives of their own choosing and in a manner consistent with their own customs, values, and norms.” This Indicator evaluates whether there is a consultation process and, if necessary, an accommodation process before proposed and planned activities. Under this Indicator, using lawsuits to protect and recognise rights is not considered a consultation process. In Alberta, Indigenous Peoples identify as First Nations, Métis, Inuit or multiple Indigenous ethnicities. The collective term is Indigenous Peoples unless otherwise stated. Refer to Indicator 4.2.4 Legal, Customary & Traditional Tenure & Use Rights regarding the respect, identification, and documentation of legal, customary, and traditional tenure and use rights, Indicator 4.2.7 Designated Cultural Heritage Sites Preserved regarding the protection of cultural heritage sites which have been identified and designated and Section 4.3 for an overview of Indigenous Peoples in Alberta.

In the absence of FPIC or a consultation process, existing Indigenous rights may not be respected, potentially leading to violations of tenure and use rights.

### International

- UN Declaration on the Rights of Indigenous Peoples (UNDRIP)

### Federal

- UN Declaration on the Rights of Indigenous Peoples Act (UNDRIP Act)
- Constitution Act, 1982 Treaties
  - Truth and Reconciliation Commission (TRC)’s Calls to Action

- Treaty 4
- Treaty 6
- Treaty 7
- Treaty 8
- Treaty 10

These treaties were made between the First Nations and the British Crown, before the province of Alberta was established.

### Provincial

- Métis Settlements Act

### **Enforcement and monitoring**

Section 35 of the Constitution Act, 1982 recognises and affirms the existing Aboriginal and treaty rights of the Indigenous Peoples of Canada. . In addition, The Government of Canada is committed to achieving reconciliation with Indigenous peoples through a renewed, nation-to-nation, government-to-government, and Inuit-Crown relationship based on recognition of rights, respect, co-operation, and partnership as the foundation for transformative change as stipulated in the 10 principles of the Truth and Reconciliation Commission (TRC)’s ( <https://www.justice.gc.ca/eng/csj-sjc/principles-principes.html>) The principle 6 is particularly relevant in the context of the indicator 4.2.4: ***“The Government of Canada recognizes that meaningful engagement with Indigenous peoples aims to secure their free, prior, and informed consent when Canada proposes to take actions which impact them and their rights, including their lands, territories and resources”***

The Constitutional Act, 1867 gave the provinces ownership and authority over natural resources.

Indigenous Peoples’ rights continue to be defined and delineated via the courts in Alberta.

The Alberta government has signed separate protocol agreements with three First Nations:

## Annex 1 Detailed findings for Supply Base Evaluation

- September 2019, with the Blackfoot Confederacy;
- October 2020, with the Stoney Nakoda-Tsuut'ina Tribal Council;
- December 2020, with the Treaty 6 First Nations.

The Aboriginal Consultation Office in the Alberta Ministry of Indigenous Relations is the designated agency that oversees Indigenous consultation and accommodation. The Aboriginal Consultation Office's document—The Government of Alberta's Proponent Guide to First Nations and Métis Settlements Consultation Procedures— outlines the delegation of responsibility for Indigenous consultation to Forest Management Agreement (FMA) holders.

Proponents of projects under the jurisdiction of the Alberta Ministry of Forests and Parks (MFP) must use the Proponent Guide provided that the project impacts meet the relevant impact threshold. The Alberta government has delegated the responsibility for consultation to FMA holders. MFP provides direction to FMA holders regarding the required level of consultation and who should be consulted, with advice from the Aboriginal Consultation Office. This advice, and the consultation and accommodation process, is based on the direction in The Government of Alberta's Proponent Guide to First Nations and Métis Settlements Consultation Procedures. Consultation is required to be completed by forestry operations. The FMA holder creates an information package for First Nations and Métis including a map of proposed operations. The package is sent to the regional MFP forest officer who sends the package to the Aboriginal Consultation Office. The Aboriginal Consultation Office assesses the information package to determine its adequacy and which communities, or other entities, should be consulted. Usually, the FMA holder consults on behalf of the quota holders. The regional MFP forest officers can give guidance to the FMA holder but cannot speak for the Aboriginal Consultation Office. Sometimes there is direct contact between the FMA holder and the Aboriginal Consultation Office. The FMA holder is required to annually update the General Development Plan. The General Development Plan is the only plan consultation is required. Consultation with First Nations and Métis occurs annually. The consultation is usually focussed on the current year. Accommodation agreements between the FMA holder and the First Nation or Métis Settlement can be made without government involvement, and the agreements are confidential.

As of March 2024, there is no publicly available information regarding engagement or consultation processes between Indigenous Peoples and private land in Alberta.

The protocol agreements between the Alberta government, Blackfoot Confederacy, Stoney Nakoda-Tsuut'ina Tribal Council and Treaty 6 First Nations set out the oversight framework for consultation. The Aboriginal Consultation Office provides advice, oversight, and enforcement for consultation. The Office assesses the adequacy of FMA holder's consultation effort. If the Aboriginal Consultation Office deems consultation to be insufficient or inadequate, the FMA holder is required to undertake additional steps to reach an adequate level of consultation. As of March 2024, there is no publicly available information regarding consultation oversight between Indigenous Peoples and owners of private land in Alberta.

As of March 2024, there is no publicly available information on free, prior and informed consent (FPIC) agreements with any Indigenous Peoples in Alberta.

The Aboriginal Consultation Office assesses the consultation that has occurred between a forestry company and Indigenous People(s) and does not approve forestry operations to proceed unless it is determined that sufficient consultation and accommodation had occurred. As of March 2024, the Aboriginal Consultation Office does not make the consultation adequacy assessments publicly available, nor does it publish summary reports or annual reports. As of March 2024, there is no publicly available information regarding consultation requirements on private land.

### **Risk conclusion and justification**

In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the principles of the Reconciliation Strategy, the Government recognizes the right of Indigenous Peoples to participate in decision-making on matters that affect their rights, through their own representative institutions. It also acknowledges the obligation

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |  |
|-------------------------------------|--|
|                                     | <p>to consult and cooperate in good faith with the aim of securing their free, prior, and informed consent (FPIC). The importance of FPIC, as outlined in the UN Declaration, extends beyond titled lands and encompasses broader issues related to Indigenous rights, governance, and stewardship responsibilities. Therefore, this Indicator is designated as low risk for Crown land in Alberta. In addition, Indigenous Peoples have not asserted tenure and use rights on private land. As such, this Indicator is also designated as specified risk for private land in Alberta.</p>   |
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures</li> <li>• Consultation agreements</li> <li>• Grievance/dispute resolution mechanisms</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Legal, customary &amp; traditional tenure &amp; use rights identified</li> <li>• Consultation notices, opportunities, meeting minutes, records, and outcomes, including accommodation, if applicable</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with Indigenous People</li> <li>• Interview with experts</li> </ul> |

## Annex 1 Detailed findings for Supply Base Evaluation

|                                 |   |
|---------------------------------|---|
| <p><i>Evidence reviewed</i></p> | <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <a href="#">UN Declaration on the Rights of Indigenous Peoples</a></li> </ul> <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution Act, 1982, section 35</a></li> <li>• <a href="#">UN Declaration on the Rights of Indigenous Peoples Act</a></li> <li>• Truth and Reconciliation Commission (TRC)'s Calls to Action</li> <li>• </li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Government of Alberta's Policy on Consultation with First Nations on Land and Natural Resource Management, 2013 (Amended 2020).</a></li> <li>• <a href="#">Government of Alberta's Policy on Consultation with Métis Settlements on Land and Natural Resource Management, 2015 (Amended 2020).</a></li> <li>• <a href="#">Métis Nation within Alberta Self-Government Recognition and Implementation Agreement, 2023</a></li> <li>• <a href="#">Métis Settlements Act</a></li> <li>• <a href="#">The Government of Alberta's Proponent Guide To First Nations and Metis Settlements Consultation Procedures (2019)</a></li> <li>• <a href="#">The Government of Alberta's Proponent Guide to First Nations and Metis Settlements Consultation Procedures. Alberta Consultation Office. 2019.</a></li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Civil Liberties Research Centre</a></li> <li>• <a href="#">First Nations Reserves and Metis Settlements</a></li> <li>• <a href="#">Indigenous consultation notices and information updates</a></li> <li>• <a href="#">Proponent-led Indigenous consultations</a></li> </ul> |
| <p><i>Risk rating</i></p>       | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>   |
| <p><b>4.2.7</b></p>             | <p><b>Designated cultural heritage sites shall be preserved.</b></p>  |
| <p><i>Findings</i></p>          | <p><b>Scale of assessment</b><br/>Crown Land, Private Land</p> <p><b>Analysis</b><br/>Sustainable Biomass Program's (SBP's) glossary defines cultural values as "sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples." This Indicator assesses if identified and designated cultural heritage sites are protected. Designation implies that a site has met specified criteria for it to be recognized as a cultural heritage site.</p>  |

## Annex 1 Detailed findings for Supply Base Evaluation

Cultural heritage sites that are not identified and protected are at risk of being damaged or destroyed, resulting in the loss of cultural heritage and history and causing cultural and environmental harm.

### Provincial

- Historical Resources Act
- Archaeological and Palaeontological Research Permit Regulation

### **Enforcement and monitoring**

#### Provincial

The Historical Resources Act is administered by the Alberta Ministry of Arts, Culture and Status of Women, Archaeological Survey Branch. Cultural heritage resources in Alberta are protected under the Act whether known or unrecorded. The Historical Resources Act empowers the Minister of Arts, Culture and Status of Women to designate sites that meet relevant criteria for historic and cultural importance as a Provincial Historic Resource or as a Provincial Historical Site. The Act also gives municipal governments the ability to designate historical sites as Municipal Historic Resources or Municipal Historical Sites.

There are five classifications of cultural heritage resource sites under the Act, based on the sites' Historic Resource Value. Value 1 category sites are protected under provincial designations, value 3 category requires avoidance, and value 4 requires further study. The Ministry of Arts, Culture and the Status of Women has a publicly available listing of historic resource consultants qualified to conduct the requirements of the Historical Resources Act. Qualifications of cultural resource management consultants are described in the Archaeological and Palaeontological Research Permit Regulation, under the Historical Resources Act.

Under the Historical Resources Act, the Ministry of Arts, Culture and Status of Women is responsible for maintaining the Listing of Historic Resources of areas that contain or have a high potential to contain historic resources, including archaeological and palaeontological sites, Indigenous traditional use sites of historic resource, and/or historic structures. The publicly available Listing of Historic Resources provides the Historic Resource Value (if any) that has been assigned to identified lands as a general location. The Listing of Historic Resources is a tool to aid developers, municipalities, industry representatives (including timber disposition holders) and private landowners to determine if a proposed project may impact historic resources. The Historical Resources Act prohibits the disturbance of a wide range of cultural sites and artifacts, unless an alteration permit has been issued from the Minister of Arts, Culture and Status of Women. The Act and registry are applicable to Crown land and private land.

#### Crown Land

As of 2021, an interdepartmental agreement between the Ministry of Forestry & Parks (MFP) and the Ministry of Arts, Culture and the Status of Women requires the Annual Operating Plan (AOP) of timber disposition holders to be submitted to the Archaeological Survey of Alberta for review of historical resource concerns. On Crown land, timber disposition holders, under the Historical Resources Act, are required to ensure harvesting activities will not impact historic resources. Timber disposition holders are required to hire qualified cultural resource management consultants to screen proposed harvest areas identified in the AOP for potential cultural resource sites based on a risk-rating protocol. Harvesting activities on Crown land are subject to Green Zone historic resource predictive modelling. If a potential historic resource site is identified during the screening process, a site test is conducted by the cultural resource management consultant. If site tests conclude the potential site has no historic resources of interest, harvesting operations continue as planned. If site tests conclude there are historic resources, the cultural resource management consultant provides guidance to the timber disposition holder as either avoidance through alteration of a harvesting boundary or a buffer to preserve the historic resource site. The consultants develop the permit applications, conducts a site visit and prepares a Historical Resource Impact Assessment Report. Reports are submitted to the Archaeological Survey Branch of the Ministry of Arts, Culture and Status of Women.

#### Private Land

## Annex 1 Detailed findings for Supply Base Evaluation

Private land owners are required adhere to the provincial requirements of the Historical Resources Act. Owners or operators are required to self-report historic resources to the Ministry of Arts, Culture and Status of Women if encountered. As of March 2024, there is no publicly available information describing implementation mechanisms related to the protection of designated cultural heritage sites on private land.

### Provincial

Under the Historical Resources Act, the Ministry of Arts, Culture and Status of Women is responsible for maintaining archaeological information and approval of alteration permits to allow development within protected sites. Historic Resources applications prepared by qualified cultural resource management consultants must be submitted to the Ministry of Arts, Culture and Status of Women. The permitting approval process is comprehensive to ensure that there is consistent, accurate information and that proposed actions are authorised under the Historical Resources Act. Permit approvals are issued with conditions that historic resource sites must be protected if they are identified by cultural resource management consultants. The Ministry of Arts, Culture and Status of Women is responsible for the compliance and enforcement of the Historical Resources Act. Potential violations to the Historical Resources Act are to be reported to the Ministry of Arts, Culture and Status of Women. Under the Historical Resources Act, reporting of all potential cultural heritage sites to the Ministry of Arts, Culture and Status of Women is mandatory as described in the Standard Requirements under the Historical Resources Act: Reporting the Discovery of Historic Resources. Unauthorised alteration of any cultural heritage site in Alberta is prohibited under the Historical Resources Act. This is applicable to Crown land and private land.

### Crown Land

On Crown land, cultural resource management consultants are required to submit a Historic Resources Application and final report to Archaeological Survey Branch for review and approval. Reporting requirements are detailed in the Archaeological and Palaeontological Research Permit Regulation, and submission of the final report must be within 180 days after the expiration of the permit. Final reports are reviewed and approved by Archaeological Survey of Alberta to ensure site test results have been reported and appropriate actions have been taken by the timber disposition holder in protecting historic resource sites. As identified in the Archaeological and Palaeontological Research Permit Regulation, new sites found during the Historical Resource Impact Assessment must be reported to the Ministry of Arts, Culture and the Status of Women. Sites threatened by development without authorisation must be reported to the Ministry of Arts, Culture and the Status of Women within 48 hours. The MFP is responsible for the review and approval of AOPs. As noted in the Alberta Timber Harvest Planning and Operating Ground Rules, "approval of operational plans by Forestry Division or as amended from time to time, does not imply authorisation under other provincial legislation and policy. It is the responsibility of the timber disposition holder to... obtain any other necessary approvals or permits," which include permitting and reports approved by Archaeological Survey. MFP does not confirm historical resource impact assessments at the AOP approval phase and does not specifically monitor for compliance with the Historical Resources Act.

### Private Land

Historical Resources Act oversight framework applies to private land.

### Provincial

As of March 2024, the publicly available Listing of Historic Resources identifies general areas with historic resource values in Alberta. Sites-specific information is confidential and not publicly available.

### Crown Land

A 2021 document published by the Archaeological Survey of Alberta called Forestry and Archaeology in Alberta: A History and Synthesis provides key statistics of cultural resource management in Alberta's forest sector on Crown land. As of 2020, 421 archaeological permits for forestry operations have resulted in the location of 4,640 archaeological sites, accounting for 11% of the provincial total and 42% of the total in the Green Zone. The number of forestry developments submitted for screening has increased since 2000; however, the percentage of proposed harvest blocks in the AOP selected for fieldwork has remained steady since 2008 (8% on average).

## Annex 1 Detailed findings for Supply Base Evaluation

As indicated in the report, 21 timber disposition holders met the requirements of the HRA in 2020. As of 2020, roughly 43% of sites assessed were classed as Historic Resource Value 0, which requires no further work. Approximately 57% of sites are Historic Resource Value 4, which are of moderate importance and require further evaluation by the cultural resource management consultant. A total of 0.3% of sites are Historic Resource Value 3, which must be avoided. According to the study, in most cases, harvesting in the high-potential areas is avoided. Historic resources found during site tests are reported to the Archaeological Survey of Alberta by cultural resource management consultants. A final report is developed and submitted by the cultural resource management consultants on behalf of the timber disposition holder to the Archaeological Survey of Alberta for review and approval.

### Private Land

As of March 2024, there is no publicly available information verifying the current condition pertaining to the protection of designated cultural heritage sites on private land in Alberta.

### **Risk conclusion and justification**

#### Provincial

Protection and conservation of designated cultural heritage resources is a legislated requirement, with responsibilities placed on timber disposition holders, private landowners, professional archaeologists, and Ministry of Arts, Culture and Status of Women. A registry of designated cultural heritage sites is publicly available and is updated. Due to the requirement of confidentiality, the registry is not publicly available.

#### Crown Land

There is legislation, implementation mechanisms, and a monitoring framework for the protection of cultural heritage resources on Crown land in Alberta. Qualified cultural resource management consultants are responsible for implementation mechanisms and oversight framework to manage and preserve historic resource values through screening and field verification of potential high value cultural heritage sites on proposed harvesting activities in the AOP. All permit applications and final reports submitted by cultural resource management consultants are reviewed and approved by Ministry of Arts, Culture and Status of Women. Reporting of historic resources sites is mandatory on Crown land. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in Alberta.

#### Private Land

There are provincial legislative requirements for the protection of cultural heritage sites on private managed forest land and other private land. However, there is no publicly available information describing implementation mechanisms, a monitoring framework, and/or results of the current condition for the protection of cultural heritage sites. Due to a lack of evidence, a precautionary approach is applied, and this Indicator is designated as specified risk for private land in Alberta.

## Annex 1 Detailed findings for Supply Base Evaluation

|                                     |   |
|-------------------------------------|---|
| <p><i>Means of verification</i></p> | <ul style="list-style-type: none"> <li>• Regulatory framework</li> <li>• Regulatory agency websites</li> <li>• Forest management plans</li> <li>• Best management practices and/or operational procedures</li> <li>• Regulatory compliance and enforcement data/reports</li> <li>• Oversight agency database records and/or reports</li> <li>• Designated cultural heritage sites identified</li> <li>• Consultation notices, opportunities, meeting minutes, records, and applicable outcomes</li> <li>• Site plans and/or post-activity inspections demonstrate negative impacts mitigated</li> <li>• Publicly available information (reports, news &amp; websites)</li> <li>• Interviews with regulatory/oversight agency</li> <li>• Interview with Indigenous People</li> <li>• Interview with experts</li> </ul> |
| <p><i>Evidence reviewed</i></p>     | <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Historical Resources Act</a></li> <li>• <a href="#">Archaeological and Palaeontological Research Permit Regulation</a></li> <li>• <a href="#">Alberta Register of Historic Places</a></li> <li>• <a href="#">Forestry and archaeology in Alberta: A history and synthesis. Archaeology in Western Canada's Boreal Forest</a>, 2021.</li> <li>• <a href="#">Alberta Listing of Historic Resources (Spring 2024)</a></li> <li>• <a href="#">Alberta Historic Resource Consultants Contact List (2023)</a></li> <li>• <a href="#">Standard Requirements Under the Historical Resources Act: Reporting the Discovery of Historic Resources</a></li> </ul>   |
| <p><i>Risk rating</i></p>           | <p>Crown Land <b>Low risk</b></p> <p>Private Land <b>Specified risk</b></p>   |

## Annex 2 List of experts consulted and contacts of Working Body

| Expert                | Affiliation & role   |
|-----------------------|--|
| Ben Hudson            | Manager, Carbon Accounting and Reporting, Canadian Forest Service, NRCan   |
| Bob Barnestson        | Professor of Labour Relations, University of Athabasca   |
| Caroline Whitehouse   | Forest Health Specialist, Ministry of Forestry and Parks   |
| Darren Aitkin         | Director, Reforestation, Inventory and Biometrics Section, Ministry of Forestry and Parks  |
| Darryl Bereziuk       | Director Archaeology, Alberta Government   |
| Deogratias Rweyongeza | Co-director, Alberta Biodiversity Monitoring Institute   |
| Dr. Erin Bayne        | Co-director, Alberta Biodiversity Monitoring Institute   |
| Glenora Coles         | Pesticide Approvals & Registration Specialist, Ministry of Environment and Protected Areas   |
| Graham Legaarden      | Director, Forest Policy, Alberta Forest Products Association   |
| Janis Braze           | Director, Forest Planning, Ministry of Forestry and Parks  |
| Jason Charlwood       | Director, Indigenous Liaison, Ministry of Environment and Parks Forest, Stewardship and Trade Branch   |
| Jeremy Bluetchen      | Ministry of Forestry and Parks   |
| John Stadt            | Provincial Forest Ecologist, Ministry of Forestry and Parks  |
| Joshua Wasyliv        | ACIMS Data Biologist, Ministry of Environment and Protected Areas  |
| Kelly Williams        | Acting Director, Species at Risk and Stewardship Section, Ministry of Environment and Protected Areas  |
| Kim Lalonde           | Executive Director, Ministry of Environment and Protected Areas, Land Plans Branch   |
| Randy Basom           | Director, Regional Employment and Training, Edmonton/North, Alberta Government, Ministry of Jobs, Economy and Trade, Employment Standards Branch |

## Annex 2 List of experts consulted and contacts of Working Body

|                 |  |
|-----------------|--|
| Rob Popowich    | Director of Forest Operations, Ministry of Forestry and Parks                                  |
| Shane Neigel    | A/ Director, Forest Economics & Trade, Ministry of Forestry and Parks                          |
| Sheila Harrison | Vice President, Policy, Alberta Forest Products Association                                    |
| Susan Cotterill | Director, Species at Risk and Stewardship Section, Ministry of Environment and Protected Areas |
| Thompson Nunifu | Data Standards and Services Mgr., Ministry of Environment and Protected Areas                  |
| Todd Kristensen | Regional Archeologist, Alberta Government  |
| Vicki Lalonde   | AB Labour Relations Board Officer, Alberta Labour Relations Board                              |

### Working Body for Draft RRA (September 2024)

The team listed below acted as the Working Body responsible for drafting the earlier version of the Draft Regional Risk Assessment (RRA) that was released for public consultation in November 2024. The responsibility for the further iterations of the Draft RRA was then transitioned to SBP. As such, the team listed below was not responsible for completing or finalising the RRA.

#### Brenda Hopkin (B.Sc. (For), RPF)

Brenda Hopkin is an independent consultant specialising in forestry certification. Her extensive experience with sustainable forest management initiatives, auditing, monitoring programs and public consultation has contributed to developing her broad perspective and comprehensive skill set. Clients include provincial and national level governments, industry and not-for-profit organisations. Brenda has been an auditor since 2000, specialising in auditing environmental, national and international standards, focusing on sustainability and legality requirements, as well as greenhouse gas (GHG). She has extensive technical and operational knowledge of requirements for forest management, chain of custody and risk-based systems along the supply chain (Canadian Standards Association (CSA®), Forest Stewardship Council (FSC®), Program for the Endorsement of Forest Certification (PEFC®), Sustainable Forestry Initiative (SFI®), and the Sustainable Biomass Program (SBP)). Brenda has completed or participated in over 160 internal/external audits, including developing the audit plan, developing/implementing audit protocol, and writing articulate findings. Brenda has supported the roll-out of sustainable forest management legislation, policy, certification, and operational procedures in a consulting role. Brenda is the Coordinator responsible for collating the *Draft* Regional Risk Assessments for Alberta, British Columbia, New Brunswick and Nova Scotia. In addition she is a registered member of the Economic Chamber of FSC International and is a past member of a 12-person Standards Development Group for FSC Canada. Brenda participated for six years on the SBP Technical Committee. Brenda is a Registered Professional Forest in British Columbia.

#### Glen Dunsworth (B.Sc. (For), M.Sc. (For. Genetics), R.P. Bio. (retired))

Glen is an Ecological Consultant providing services in forest ecology, wildlife resource management, conservation biology and strategic planning. He has over 25 years of experience in the BC coastal forest industry with Macmillan Bloedel and Weyerhaeuser. He directed regeneration and biodiversity research and developed effective new strategic approaches to ecosystem-based management. He has facilitation, organizational, and project management experience in landscape and strategic planning.

## Annex 2 List of experts consulted and contacts of Working Body

Glen specialises in biodiversity, genetics, landscape ecology, and ecosystem-based management. He has strong technical writing skills with over 50 journal publications, including editing and co-authoring a recently published UBC Press textbook. As a consultant, Glen has provided conservation and ecological strategic planning advice to a number of BC forest companies and conservation organisations. In addition to the 25 years of industrial experience, during the latter 10 years of his career, he was a forest ecology consultant and worked with the Rain Forest Alliance as a wildlife and forest ecology auditor on 25 FSC audits in BC, Alberta and Ontario. He served as SelectSeed Company Director, President, and Board Chair for 19 years. His most recent experience in large project management was developing and implementing an adaptive management and monitoring program supporting Weyerhaeuser's Coast Forest Strategy (1999-2004), a major shift in forest management from a clear-cut to a variable retention approach. This experience was published as a case study textbook for UBC Press in 2009. Glen has contributed to the Draft RRAs for Alberta, British Columbia, New Brunswick and Nova Scotia.

### Marie-Ange Fournier, (B.A. Geography and Environmental Sci., Adv. Dip. GIS)

Marie is a GIS Analyst currently working with biologists, forestry professionals and land managers on research, forest, and land management projects. She has worked in Canada and the US and is conversant with provincial, national, and international datasets. Recently she has worked on fuel management planning and fire risk reduction projects in southeastern BC as well as wildlife connectivity and biodiversity projects in the East and West Kootenays. Marie's project management and GIS experience were invaluable to completing the Draft RRAs for Alberta, British Columbia, New Brunswick and Nova Scotia. Before becoming a GIS consultant, Marie worked for 10 years with BC regional and municipal governments as a GIS Analyst and Planning Assistant. She has worked closely with the public, developers and their consultants, elected officials, and First Nations. Marie has routinely liaised with and is familiar with various government agencies and staff, including BC Design Review Panels, Heritage Commissions, the Agricultural Land Commission, and all operating areas of municipal and regional districts in BC.

### Jessica Hochins (B. Sc. (For), RPF)

Jessica is a Registered Professional Forester with the Forest Professionals of British Columbia. Since 2013, she has worked in the forestry industry in British Columbia, Alberta and Ontario, specialising in planning, harvesting and road construction supervision, and program coordination maintaining SAFE companies (BC Forest Safety Council), SFI, PEFC and SBP forest certifications. Jessica has contributed to the Draft Regional Risk Assessments for Alberta, British Columbia, New Brunswick and Nova Scotia.

### Alexa Matthes (B.Sc., A.Ag.)

Alexa Matthes is a Professional Agrologist and Environmental Scientist. She is a Project Scientist for the Trail Area Health and Environment Program. Alexa has worked in various environmental roles since 2014. Her experience includes soil remediation, site planning and management, industrial sampling methods and invasive plant removal. She has been involved in research and data collection for a variety of forestry-related projects. Her contribution to the Draft RRAs for Alberta, British Columbia, New Brunswick and Nova Scotia has included updating documents and obtaining relevant stakeholder information.

### Jennifer Raworth

Jennifer is a versatile market communications specialist with over 23 years of developing, leading and implementing multi-faceted domestic and international campaigns for the forest products industry, government, and associations. She has provided communications expertise to the Wood Pellet Association of Canada, Forestry Innovation Investment and Interfor. Jennifer has reviewed and edited the Draft RRAs for Alberta, British Columbia, New Brunswick and Nova Scotia.

### Krista West (BSF, MPA)

With a background in social auditing in a natural resource management context, Krista specialises in the establishment and delivery of certification services for environmental, social and governance standards systems. She has worked with several certification schemes, primarily in forestry and mining, to establish performance and chain of custody standards, develop assessment procedures and contribute to monitoring and evaluation programs and governance.

## Annex 2 List of experts consulted and contacts of Working Body

In addition to leading committees on human and labour rights, greenhouse gases, environment, and chain of custody, she has facilitated standards revision discussions at a global level. A speaker at certification and mining conferences globally, she has also participated in several advisory roles, including participating in a United Nations Advisory Group on the use of certification schemes to combat modern slavery. She has developed several auditor training programs and trained auditors globally. Previous to her work with certification schemes she oversaw a certification program that included over 40 million hectares of FSC- certified forests and 400 FSC Chain of Custody certificates. Krista has contributed to the Draft RRAs for Alberta, British Columbia, New Brunswick and Nova Scotia.

### Jeremy Williams (B.Sc. (For), Ph.D. (For. Econ.), RPF)

Dr. Williams has worked with many certification systems, including standards regarding forest management (certification and compliance), forest carbon offsets, aggregate pits and quarries, and biomass, Jeremy is an experienced forest auditor, and he has contributed to the Draft RRA for Alberta, British Columbia, New Brunswick and Nova Scotia. He has also led the production of assessments of the impact of pellet feedstock procurement on the forests in the catchment area of four Drax facilities in British Columbia. Jeremy has completed numerous business cases, economic evaluations, and reviews. He is knowledgeable and experienced in forest carbon pricing and accounting and has extensive experience working with and advising Indigenous People. In addition, Jeremy has extensive forest economics experience, including reviews of timber markets and timber pricing, stumpage rates, and timber production costs. In 2017, he was a member of the Nova Scotia premier's Forest Sector Review team. In the Review, Jeremy was the lead assessor of the state of timber markets, particularly in southwest Nova Scotia, and he undertook a thorough analysis of harvest rates and costs, silvicultural costs, and reimbursement rates.

## Annex 3 List of publications used

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- Facts About Water in Alberta
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- Forest and Prairie Protection Act
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- Forest Operations Monitoring Program Sustainable Forest Management 2016 Facts & Statistics
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- Regional Landscape Assessments
- Regulated Forest Management Profession Act
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- Release Reporting Regulation
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## Annex 4 List of Stakeholders

The table below summarises the stakeholders notified during the public consultation period

| Type of Organisation               | Number of organisation notified |
|------------------------------------|---------------------------------|
| Certification Body                 | 1                               |
| Certification scheme               | 4                               |
| Economic Interest                  | 17                              |
| Environmental Interest             | 34                              |
| National and state forest agencies | 29                              |
| Research institution               | 3                               |
| Social Interest                    | 66                              |
| <b>Grand Total</b>                 | <b>155</b>                      |

## Annex 5 Stakeholder consultation report

| Stakeholder            | Comment   | Response   |
|------------------------|---|--|
| Environmental Interest | <p>Annex 2 - List of experts consulted and contacts of Working Body</p> <p>AWA is concerned with the lack of transparency in the List of Stakeholders provided in Annex 4 of the RRA. Annex 4 only includes the eight broad categories of stakeholder (i.e., economic interests, environmental interests, etc.) who were consulted with in the development of the RRA, but the RRA does not list who the specific stakeholders were, who they represent, and in what proportion various interest groups were represented. To ensure that the RRA development process was unbiased, there should have been equal representation between all eight stakeholder categories to avoid over-weighting feedback from a particular interest group. AWA also has concerns regarding the inclusion of a representative from the Alberta Forest Products Association (AFPA) in the list of experts consulted (Annex 2). AFPA is a non-profit that represents the Alberta Forestry Industry and uses its position to lobby Alberta's provincial government to the benefit of industry. For example, an AFPA report from 2020 was provided to Alberta's former Minister of Agriculture provided recommendations on how to increase wood supply from Crown land, including an increase to annual allowable cuts, logging in protected areas, and intensifying forest management. In addition, there seems to be limited consideration for Indigenous inherent, Constitutional, and/or Treaty Rights within the development of the RRA. No Indigenous Community representatives are included in the list of experts consulted (Annex 2), and no Indigenous interests are included in the list of stakeholders (Annex 4).</p> | <p>Thank you for your comment. Experts have contributed to the development of the Regional Risk Assessment (RRA). To ensure a diverse range of perspectives is included in the final version before publication, a public consultation has been initiated, as announced by the Working Body and SBP. The Working Body is required to reach out to the parties listed in Section 5.4 of the RRA Procedure. This outreach is a control point that SBP reviews before allowing the report's finalization and publication. Additionally, the RRA undergoes a review by a local expert and the SBP Technical Committee before it receives approval.</p> |
|                        | <p>Annex 4 - List of stakeholders</p> <p>AWA is concerned with the lack of transparency in the List of Stakeholders provided in Annex 4 of the RRA. Annex 4 only includes the eight broad categories of stakeholder (i.e., economic interests, environmental interests, etc.) who were consulted with in the development of the RRA, but the RRA does not list who the specific stakeholders were, who they represent, and in what proportion various interest groups were represented. To ensure that the RRA development process was unbiased, there should have been equal representation between all eight stakeholder categories to avoid over-weighting feedback from a particular interest group. AWA also has concerns regarding the inclusion of a representative from the Alberta Forest Products</p>   | <p>Thank you for your comment. Experts have contributed to the development of the Regional Risk Assessment (RRA). To ensure a diverse range of perspectives is included in the final version before publication, a public consultation has been initiated, as announced by the Working Body and SBP. The Working Body is required to reach out to the parties listed in Section 5.4 of the RRA Procedure. This outreach is a control point that SBP reviews before allowing the report's finalization and publication. Additionally, the RRA undergoes a review by a local expert and the SBP Technical Committee before it receives approval.</p> |

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|  | <p>Association (AFPA) in the list of experts consulted (Annex 2). AFPA is a non-profit that represents the Alberta Forestry Industry and uses its position to lobby Alberta’s provincial government to the benefit of industry. For example, an AFPA report from 2020 was provided to Alberta’s former Minister of Agriculture provided recommendations on how to increase wood supply from Crown land, including an increase to annual allowable cuts, logging in protected areas, and intensifying forest management. In addition, there seems to be limited consideration for Indigenous inherent, Constitutional, and/or Treaty Rights within the development of the RRA. No Indigenous Community representatives are included in the list of experts consulted (Annex 2), and no Indigenous interests are included in the list of stakeholders (Annex 4).</p>   |   |
|  | <p>Indicator 1.1.1</p> <p>Forest certifications are intended to identify forests that are managed in a way that meets agreed-upon standards, and to label products originating from those forests to promote sustainable forestry practices.</p> <p>According to the RRA, 46 percent (16655912 of 36182600 ha) of the supply base has been certified under the Sustainable Forestry Initiative (SFI) certification scheme.</p> <p>SFI is North America’s largest forest certification system and is backed by the logging industry. SFI gives the impression that logging operations certified to the SFI standard are sustainable while having no rules requiring that logging meet prescribed sustainability criteria nor any on-the-ground assessment to confirm sustainability.</p> <p>SFI has long faced criticism from environmental and community groups in both Canada and the United States including an ongoing investigation being conducted by Canada’s Competition Bureau which was triggered by a complaint filed by Ecojustice on behalf of several environmental organizations – including AWA – back in November 2022.</p> <p>Considered in the context of an internationally accepted definition of sustainable forest management, the groups say SFI is misrepresenting the standards of its certification system, and that this has contributed and will continue to contribute to unsustainable logging globally and in Canada on an immense scale. SFI’s certification allows clearcutting, spraying of toxic chemicals, and logging of endangered forests (including old growth forests and caribou habitat).</p> | <p>Thank you for your comments.</p> <p>SFI-certified forests cover more than 120 million hectares (300 million acres) in North America, making it one of the largest forest certification standards in the region. It is endorsed by the Programme for the Endorsement of Forest Certification (PEFC), which helps increase its acceptance in global markets. Large-scale industrial forest owners and major timber companies in Canada and the U.S. frequently adopt SFI because of its compatibility with existing forest management practices and its emphasis on responsible fibre sourcing. SFI includes requirements for sustainable forest management, biodiversity conservation, and community engagement.</p> <p>The role of the SBP RRA is to assess the existing forest governance, legislation and certification in the geographical region concerned in order to assign a risk rating. SBP has benchmarked the PEFC programme and is not in a position to remove SFI from the list of certifiers in Alberta.</p> |

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|  | <p>In Canada, the Competition Act makes it illegal for organizations to make false or misleading claims that deceive the public about the products or services they offer. If the inquiry by the Competition Bureau finds that SFI has misled the public, it may require SFI to not only remove all sustainability claims from its public communications about the SFI standard, and from the name of the program itself, but to also publicly retract its sustainability claims and moreover, pay a fine of up to \$10 million directed towards conservation projects.</p> <p>Given these concerns, AWA believes that no biomass feedstock production can be considered sustainable if it is produced from wood that has been harvested in SFI certified forests. In addition, AWA recommends that the SBP consider removing SFI from the list of forest certifications within its RRA criteria for future assessments.</p>   |  |
|  | <p>Indicator 2.1.3</p> <p>In Alberta, regional land-use plans are one of the primary mechanisms used to manage human disturbance across the landscape. Regional plans are supposed to divide a region into areas where development can occur, areas with limited human activities, and areas that are set aside for environmental protection and conservation. Regional plans are intended to plan out economic, environmental, and social objectives in a way that minimizes the cumulative impacts of human activities.</p> <p>The majority of Alberta’s forests are located within the boreal forest natural region, covering roughly 58 percent of the province, which is acknowledged in the RRA. The boreal region is predominantly shared across four land-use planning regions, which are the: 1) Upper Athabasca, 2) Lower Athabasca, 3) Upper Peace, and 4) Lower Peace regions.</p> <p>However, as of December 2024, no regional plans have been developed and/or implemented for three of the four regions listed above (i.e., Upper Athabasca, Upper Peace, and Lower Peace). This means that there is no regional land use plan in place to properly plan and/or manage the cumulative impacts of human activities within those three regions.</p> <p>With respect to the Lower Athabasca Regional Plan (LARP), Alberta’s regional planning process allows for individuals or groups who are directly and adversely affected to request a review of a land-use plan. In 2015 a report was published by a review panel which was commissioned on behalf of six directly and adversely affected First Nations in the Lower Athabasca Region:</p> | <p>Thank you very much for your comments. We have updated the indicator accordingly.</p> |

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|  | <p>Athabasca Chipewyan First Nation, Mikisew Cree First Nation, Cold Lake First Nation, Fort McKay First Nation, Fort McKay Metis Community Association, and Chipewyan Prairie Dene First Nation.</p> <p>The primary findings of the 2015 LARP Review Panel Report highlighted that the cumulative effects of rapid industrial development in the lower Athabasca region were negatively impacting First Nations, and that the Government of Alberta did not adequately address the arguments put forward by First Nations, or the written evidence they provided. The Review Panel Report found that the interest of First nations were not incorporated into LARP in any meaningful way. Cumulative effects of industrial development in the lower Athabasca region were found to be negatively impacting the Constitutional Rights of First Nations and their traditional land uses.</p> <p>Given that three of four regional plans intended to manage human activities across the boreal region are incomplete; and given that the only completed regional plan (i.e., LARP) has been heavily criticized for allowing cumulative impacts to negatively impact Indigenous Rights, then the SBP should not consider any forestry activities within the boreal to be sustainable. This includes any/all biomass feedstock attained through forestry activities conducted in Alberta’s boreal region.</p> <p>Woodland caribou (<i>Rangifer tarandus caribou</i>) were listed as threatened under Schedule 1 of Canada’s Species at Risk Act (SARA) in 2003. The purpose of SARA is to prevent wildlife species from becoming extinct or extirpated, and to help in the recovery of extirpated, endangered, or threatened species.</p> <p>Environment Canada published its recovery strategy for boreal woodland caribou in 2012. According to the recovery strategy, critical habitat for boreal caribou is identified as: “i) the area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65% of the area as undisturbed habitat; and ii) biophysical attributes required by boreal caribou to carry out life processes.”</p> <p>This means that caribou populations require a minimum of 65 percent of the habitat within their range to be undisturbed to have a 60 percent chance of becoming self-sustaining. The Government of Alberta’s process to achieve the 65 percent undisturbed critical habitat thre</p> |                  |
|  | Indicator 4.2.4  | See answer above |

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In Alberta, regional land-use plans are one of the primary mechanisms used to manage human disturbance across the landscape. Regional plans are supposed to divide a region into areas where development can occur, areas with limited human activities, and areas that are set aside for environmental protection and conservation. Regional plans are intended to plan out economic, environmental, and social objectives in a way that minimizes the cumulative impacts of human activities.

The majority of Alberta's forests are located within the boreal forest natural region, covering roughly 58 percent of the province, which is acknowledged in the RRA. The boreal region is predominantly shared across four land-use planning regions, which are the: 1) Upper Athabasca, 2) Lower Athabasca, 3) Upper Peace, and 4) Lower Peace regions.

However, as of December 2024, no regional plans have been developed and/or implemented for three of the four regions listed above (i.e., Upper Athabasca, Upper Peace, and Lower Peace). This means that there is no regional land use plan in place to properly plan and/or manage the cumulative impacts of human activities within those three regions.

With respect to the Lower Athabasca Regional Plan (LARP), Alberta's regional planning process allows for individuals or groups who are directly and adversely affected to request a review of a land-use plan. In 2015 a report was published by a review panel which was commissioned on behalf of six directly and adversely affected First Nations in the Lower Athabasca Region: Athabasca Chipewyan First Nation, Mikisew Cree First Nation, Cold Lake First Nation, Fort McKay First Nation, Fort McKay Metis Community Association, and Chipewyan Prairie Dene First Nation.

The primary findings of the 2015 LARP Review Panel Report highlighted that the cumulative effects of rapid industrial development in the lower Athabasca region were negatively impacting First Nations, and that the Government of Alberta did not adequately address the arguments put forward by First Nations, or the written evidence they provided. The Review Panel Report found that the interest of First nations were not incorporated into LARP in any meaningful way. Cumulative effects of industrial development in the lower Athabasca region were found to be negatively impacting the Constitutional Rights of First Nations and their traditional land uses.

Given that three of four regional plans intended to manage human activities across the boreal region are incomplete; and given that the only completed regional plan (i.e., LARP) has been heavily criticized for allowing cumulative

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|                        | <p>impacts to negatively impact Indigenous Rights, then the SBP should not consider any forestry activities within the boreal to be sustainable. This includes any/all biomass feedstock attained through forestry activities conducted in Alberta's boreal region.</p>  |   |
| Environmental Interest | <p>Section 2 - Regional background and statement of scope</p> <p>SFI Certification The RRA mentions the Sustainable Forestry Initiative (SFI) as a certification system in Canada. However, SFI has faced significant criticism for its lack of robust sustainability criteria and its ties to the logging industry. Specifically:</p> <ul style="list-style-type: none"> <li>• Lack of Accountability: SFI does not require logging operations to meet verifiable sustainability standards, nor does it perform thorough on-the-ground assessments.</li> <li>• Environmental Concerns: SFI-certified logging operations allow practices such as clearcutting, toxic chemical use, and logging in endangered forests, including old-growth and caribou habitats.</li> <li>• Ecojustice complaint to the Competition Bureau: Ecojustice, representing several environmental organizations, filed a complaint with the Competition Bureau of Canada against SFI. The group argued that SFI misrepresents its certification system, leading consumers to believe it ensures sustainability when it does not. This misleading practice has contributed to unsustainable logging globally and within Canada on a massive scale (see links below). SBP should critically assess and, if necessary, reevaluate its inclusion of SFI certifications in its RRA. Certification systems with stronger environmental credentials and transparency should be prioritized.</li> </ul> <p><a href="https://ecojustice.ca/news/environmental-groups-fight-greenwashing-in-forestry-sustainability-certification-scheme/">https://ecojustice.ca/news/environmental-groups-fight-greenwashing-in-forestry-sustainability-certification-scheme/</a><br/> <a href="https://ecojustice.ca/news/competition-bureau-launches-investigation-into-greenwashing-complaint-against-north-americas-largest-forest-certification-scheme/">https://ecojustice.ca/news/competition-bureau-launches-investigation-into-greenwashing-complaint-against-north-americas-largest-forest-certification-scheme/</a></p> | <p>SFI-certified forests cover more than 120 million hectares (300 million acres) in North America, making it one of the largest forest certification standards in the region. It is endorsed by the Programme for the Endorsement of Forest Certification (PEFC), which helps increase its acceptance in global markets. Large-scale industrial forest owners and major timber companies in Canada and the U.S. frequently adopt SFI because of its compatibility with existing forest management practices and its emphasis on responsible fibre sourcing. SFI includes requirements for sustainable forest management, biodiversity conservation, and community engagement.</p> <p>The role of the SBP RRA is to assess the existing forest governance, legislation and certification in the geographical region concerned in order to assign a risk rating. SBP has benchmarked PEFC and is not in a position to remove SFI from the list of certifiers in Alberta.</p> |
|                        | <p>Annex 5 - Stakeholder consultation report</p> <p>I found this Annex a bit confusing because the consultation tables in this section are empty. While the language suggests the tables will be filled, it also implies this information was supposed to be included already. Thus, it is hard to really understand the purpose of this Annex, besides knowing what were the questions asked in the stakeholder consultation.</p>   | <p>Neither the SBP nor the Working Body provides a list of the organizations contacted during the public consultation due to confidentiality reasons.</p>   |
|                        | <p>Indicator 2.1.3<br/>Indicator 2.1.3 – Key Eco/HCV Areas Maintained. Part 1<br/>Caribou Habitat Protection</p>   | <p>Based on your comments and those of other organizations with similar concerns, the level of risk to caribou habitat has been</p>   |

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|  | <p>The RRA acknowledges the importance of boreal caribou habitat but does not sufficiently address critical gaps:</p> <ul style="list-style-type: none"><li>•Habitat Requirements: caribou populations require at least 65% of their ranges to remain undisturbed to have a 60% chance of being self-sustaining. Yet, Alberta continues to permit new disturbances within these ranges.</li><li>•Subregional Plans: With only 2 of 11 subregional plans completed, there is no comprehensive framework to ensure caribou habitat is protected.</li></ul> <p>Questions:</p> <ul style="list-style-type: none"><li>•How can SBP verify that biomass feedstock does not originate from caribou ranges without completed subregional plans?</li><li>•What mechanisms are in place to ensure that timber sourcing aligns with the 65% undisturbed habitat requirement?</li></ul> <p>No SBP certification should be granted for biomass sourced from caribou ranges. SBP must demand stricter safeguards for caribou conservation.</p> <p>Indicator 2.1.3 – Key Eco/HCV Areas Maintained. Part 2</p> <p>The RRA acknowledges that as of March 2024, there are no publicly available implementation mechanisms for restricting harvesting of intact forest landscapes on Crown or private lands.</p> <p>This raises significant concerns:</p> <ul style="list-style-type: none"><li>•Lack of Mechanisms: If no implementation mechanisms exist, how are biomass producers expected to mitigate the specified risk effectively? Without clear guidelines or tools, producers may not have a consistent or verifiable method to address this issue, which undermines the certification process.</li><li>•Accountability: How will SBP ensure that producers claiming to mitigate this risk are adhering to "sustainable" practices in the absence of a standardized framework? This leaves room for ambiguity.</li></ul> <p>SBP should work with regional governments and stakeholders to establish clear, enforceable mechanisms for protecting intact forest landscapes. Until these mechanisms are in place, SBP should consider withholding certifications for producers sourcing from these areas.</p> <p>Indicator 2.1.3 – Key Eco/HCV Areas Maintained. Part 3</p> <p>Given the following identified areas of uncertainty for the maintenance of biodiversity values:</p> <ul style="list-style-type: none"><li>•Caribou recovery plans,</li><li>•Species at Risk (SAR) recovery plans and critical habitat for identified species-at-risk</li></ul> | <p>defined as specified. Please be assured that SPB is fully aware of the caribou situation in the province of Alberta and other provinces and is monitoring the progress of caribou range planning at the provincial level. As you mentioned, we have added in the revised version that only 2 of the 11 sub-regional plans had been completed at the time of the current assessment.</p> <p>Regarding your comment about "<i>it Is not clear how SBP will verify that biomass production does not contribute to the degradation or critical habitats or the loss of biodiversity</i>", please review our independent audit process on our website <a href="#">The audit process - Sustainable Biomass Program</a></p> |
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|                    | <ul style="list-style-type: none"> <li>•Intact forest landscapes due to lack of provincial recognition and implementation mechanisms</li> <li>•No minimum protection targets on Rare, Threatened, and Endangered (RTE) ecosystems, and</li> <li>•Old forests not having government minimum targets</li> </ul> <p>there are critical concerns about how SBP will ensure that producers address and mitigate these risks effectively. Without clear recovery plans or protection targets, it is not clear how SBP will verify that biomass production does not contribute to the degradation or critical habitats or the loss of biodiversity.</p>  |   |
| Certification Body | <p>Section 4 - Stakeholder consultation</p> <p>Section 4 is Regional Background. Comments: 1) First sentence: they used the term First Nations referring to all three Indigenous categories (First Nations, Métis and Innu) but that is not correct. They should rather use the term Indigenous Peoples, which is the correct and more inclusive term. (They seem to have it right in the rest of the document – ex. Page 210). 2) There is no mention of existence of issues such as non-recognized indigenous communities (ex. Michel Band) nor issues related to gov and IPs interpreting the existing treaties differently or scope of what should be each community's territory of interest / "consultation area". (MR)</p>                      | <p>Thanks for pointing out this mistake. We used the term Indigenous Peoples in the revised draft.</p>  |
|                    | <p>Indicator 2.2.4</p> <p>Residue removal minimizes neg impact to ecosystem - Private land scope - Only evidence stated is no indication of systemic concerns relating to removal of harvesting residues, what is this based on, it seems lacking. i think this should be considered for specified risk on private lands. (JH)</p>  | <p>Thank you for your comment. Indeed, no monitoring and regulations have been identified for private land; however, the impact of removing harvesting residues was assessed under Criteria 2.1 without identifying any negative impact on the ecosystem.</p> |
|                    | <p>Indicator 4.2.4</p> <p>It is stated on multiple occasions that "As of March 2024, there is no publicly available information regarding Indigenous Peoples' tenure and use rights being asserted on private land in Alberta". Best to indicate which sources of information they used to come to this conclusion. I do not believe this to be accurate. It would be a lot of work, but I know many communities have maps available on their websites that show what their territory of interest is. And usually, these are not influenced by administrative limits and jurisdictions decided by colonial governments. As such, chances are there is overlap with private lands. For example, the Blackfoot Nation's ancestral territory extends</p> | <p>Given the complexity of land tenures, Indigenous rights, governance and the lack of precise spatial data, the risks have been changed to 'specified'.</p>  |

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|                   | into areas that are now privately owned. See <a href="https://www.learnalberta.ca/content/aswt/map/">https://www.learnalberta.ca/content/aswt/map/</a> (MR)   |   |
| Economic Interest | <p>Section 3 – Methodology</p> <p>Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results. Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's in other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p> | <p>Thank you for your comment. The Methodology followed by the WB is in line with the SBP Regional Risk Assessment Procedure and SBP Standard 2 and guidance. Conformity with the methodology was verified all along the process. Please refer to the REF as described in Guidance to Standard 2, p.24. SBP endeavours to ensure it is consistently applied globally across the range of geographies and experts involved in the various Regional Risk Assessments.</p> |
|                   | <p>Section 5 – Conclusions</p> <p>See specific indicator comments for feedback on conclusions made on risk ratings.</p>   | <p>The risk ratings for each indicator will be updated in the final version of the RRA once all comments and suggestions have been processed.</p>   |
|                   | <p>Annex 2 - List of experts consulted and contacts of Working Body</p> <p>Suggest AAFMP be consulted as part of Annex 2: List of Experts Consulted and Contact of Working Body for greater insight into the profession and accounting for 4.1.8 Training to workers. Also, 4.2.4 Legal, Customary &amp; Traditional Tenure &amp; Use Rights, The Ministry of Indigenous Relations was not consulted on this indicator.</p>   | <p>Thank you for your comment. Updates have been made under the suggested indicators</p>  |
|                   | <p>Annex 3 - List of publications used</p> <p>See specific indicators feedback for suggested publications that have been missed/omitted.</p>  |   |
|                   | <p>Annex 6 - REDII Level A risk assessment</p>  | <p>Thank you for your comment. The Methodology followed by the WB is in line with the SBP Regional Risk Assessment Procedure and</p>  |

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|  | <p>Disagree that the legislation relating to the legality of harvest on private land is not effective. Private owners have ownership of the trees on their property, and they may harvest and process or sell /trade the associated timber as they see fit, provided that appropriate regulations are met. The rights of private land ownership provide assurance of harvest of timber that is legally permitted, subject to applicable regulations (TM9's &amp; transport). Illegality associated with forestry is very uncommon in Canada, which is assessed by Transparency International as having a very high standard of legality (Canada is the twelfth least corrupt country in 2023). The province is generally well-surveyed and ownership disputes are rare, although boundary disputes do occur. These are resolved by surveys and in the courts as required. The legal system is the most common means of enforcement of property rights.</p>  | <p>SBP Standard 2 and guidance. Conformity with the methodology was verified all along the process. Please refer to the REF as described in Guidance to Standard 2, p.24</p>   |
|  | <p>Indicator 2.1.3<br/>         '- Relating c</p> <ul style="list-style-type: none"> <li>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</li> <li>- The term 'Key Habitat Attributes' does not exist in the Alberta Forest Management Planning Standards or the OGRs whereas the RRA indicates it is "identified" in these documents. The term 'old forests' does not exist in the OGRs whereas the RRA indicates it is "identified" in this document. Old forests are managed by selecting the Spatial Harvest Sequence which provides a 200-year planning horizon for licensees and is regularly updated. Performance on this value is reported in licensees Stewardship Reports. The AFMPS clearly</li> </ul> | <p>Thank you for your valuable comments: regarding the comments on the threat to old-growth forests, we have decided to set a specified risk as a precautionary measure for this indicator given the lack of publicly available evidence to support the implementation mechanism, monitoring and/or outcomes, to protect old-growth forests. Unlike indicator 2.1.1, for which public data currently identifies old-growth forests in Alberta, indicator 2.1.3 aims to ensure that old-growth forests are protected, among other sensitive habitats.</p> |

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|  | <p>states the objectives, monitoring and reporting of old forests. The Stewardship Reports are publicly available. What evidence is there to suggest that old forests in Alberta are under threat and that this part of the indicator should be specified risk?</p> <ul style="list-style-type: none"> <li>- RTE ecosystems are monitored by Alberta Biomonitoring Institute. This data is incorporated into Forest Management Plans and is publicly available.</li> <li>- The Fisheries and Wildlife Management Information System (FWMIS) is Alberta's repository of provincial wild species inventory data. Risks to local and Endemic Species are mitigated using data layers contained in the Fish and Wildlife Internet Mapping Tool. This tool is used in forest management planning to identify locally listed species under the Wildlife Act. The data custodian for this information set is Alberta Environment and Parks.</li> <li>- This information is collected by a variety of stakeholders including, but not limited to, academia, environmental consultants, municipal and federal governments, non-government organizations, and internal GoA business areas. All information gathered is an important contribution to the knowledge base for fisheries and wildlife management.</li> <li>- Evidence: dataset - Open Government; <a href="https://abmi.ca/abmi-home">https://abmi.ca/abmi-home</a>; <a href="https://www.alberta.ca/access-fwmis-data">https://www.alberta.ca/access-fwmis-data</a>; Forest Management Plans  ; Alberta.caBiodiversity Browser</li> </ul> |   |
|  | <p>Indicator 2.2.1</p> <ul style="list-style-type: none"> <li>'- Relating to Crown Land: <ul style="list-style-type: none"> <li>- Indicator 2.2.10 identifies the complexity &amp; layers of legislation that requires licensees to reforest after harvest on crown land. The assessment of specified risk for the 2.2.1 indicator focuses on non-forestry activities, where other indicators (2.2.4 &amp; 2.2.10) focus on the source of biomass as it relates to forest management strategies. The working body should consider isolating the specified risk to non-forest industry activities.</li> <li>- Indicator 2.2.1 should be aligned with the risk designation identified in the FSC NRA for Canada - this indicator was designated to spatial areas. Other indicators in the RRA use information from FSC to justify HCVs, the designation of risk to conversion should be considered as well.</li> </ul> </li> <li>- Relating to the province &amp; federal data <ul style="list-style-type: none"> <li>- Canada's deforestation rate is significantly low, using wording directly out of the rationale: "this Indicator is to evaluate the risk of land conversion, not the</li> </ul> </li> </ul>  | <p>Thank you for your valuable comments. As indicated in the text, the rate of deforestation in Canada and Alberta is low (less than 1% per year). However, the information provided each year by the annual report on Canada's state forests is limited to managed forests and public lands. This information is currently limited or non-existent for private land in Alberta, which is why we have applied a specified risk for Private land</p> |

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|  | <p>rate" adds subjectivity to the assessment. When considering the risk of land conversion, the body should consider the public data that suggests deforestation isn't happening in the supply base - not use precautionary approaches.</p> <ul style="list-style-type: none"> <li>- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</li> <li>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</li> </ul> <p>Evidence: <a href="https://www.mfcouncil.ca/about/annual-reports/">https://www.mfcouncil.ca/about/annual-reports/;</a><br/> <a href="https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment">https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment</a></p> |   |
|  | <p>Indicator 2.2.2</p> <ul style="list-style-type: none"> <li>'- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</li> <li>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were</li> </ul>  | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> |

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|  | <p>mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p>   |  |
|  | <p>Indicator 2.2.3</p> <ul style="list-style-type: none"> <li>'- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</li> <li>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</li> </ul> | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p>  |
|  | <p>Indicator 2.2.9</p> <ul style="list-style-type: none"> <li>'- The working body should consider this indicator at a provincial assessment level. The scale and intensity of forested private land affecting the long-term production capacity of the supply base is minimal. 15% of the scope of the RRA is private land of which only a portion of that being forested land, &amp; of the forested areas, there is a significant amount of private land that should be within TOF, which has exemptions for this indicator.</li> <li>- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</li> </ul>  | <p>Regarding Indicator 2.2.9, we agree with your assessment that only a minor portion of the supply base originates from private land. However, it is important to note that the sustainable criteria requirement for the calculation of the Allowable Annual Cut (AAC) does not apply to private land. Therefore, we have applied a specified risk. We've also maintained the distinction between private and public land to ensure consistency with the approach used in other indicators.</p> |

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|  | <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p>  | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p>  |
|  | <p>Indicator 2.2.10</p> <p><sup>1</sup>- The working body should consider this indicator at a provincial assessment level. The scale and intensity of forested private land affecting the long-term production capacity of the supply base is minimal. 15% of the scope of the RRA is private land of which only a portion of that being forested land, &amp; of the forested areas, there is a significant amount of private land that should be within TOF, which has exemptions for this indicator.</p> <p>- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</p> <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent</p> | <p>Similarly to the point above, when we have the evidence that the legal requirements applicable to public land do not extend to private land, or are not transferable, we have concluded to a specified risk for private land.</p> <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> |

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|  | <p>with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p>  |   |
|  | <p>Indicator 3.2.2</p> <p>'- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</p> <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p> | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> |
|  | <p>Indicator 3.2.3</p> <p>'- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</p> <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis,</p>  | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> |

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|  | <p>to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p> <p>- Avoidance of High Carbon Stock &amp; High Conservation Value areas is done through application of the comprehensive Alberta Wetland Inventory.</p> <p>Evidence: <a href="https://abmi.ca/abmi-home/data-resources/data-portal-main/data-portal/single-data-portal-detail.html?name=40">https://abmi.ca/abmi-home/data-resources/data-portal-main/data-portal/single-data-portal-detail.html?name=40</a></p>  |   |
|  | <p>Indicator 4.1.8</p> <p>'- This indicator separates the responsibilities of working professionals from equipment operators &amp; loggers. This should not be separated as the professional forester is responsible for the sign off that harvesting was completed to a required standard. Within the professional responsibility of a forester, ensuring qualified contractors is an element of due diligence. Any work that is done on crown land is monitored by the FOMP branch of the government, this includes the environmental aspect of carrying out forestry activities. Contraventions for trespasses, riparian impacts, &amp; soil degradation are monitored and made publicly available on the Forests Act contraventions website. Fines are levied if the cause is found. Each of these mechanisms are significant influences on the training provided to forest workers, and this should not be considered a specified risk.</p> <p>- The working body should consider excluding elements related to safety within this indicator as they are already addressed in indicator 4.1.10.</p> <p>- Suggest AAFMP be consulted as part of Annex 2: List of Experts Consulted and Contact of Working Body for greater insight into the profession and accounting for training to workers.</p> <p>- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</p> <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk</p> | <p>We agree with your comment on indicator 4.1.8. We have deleted the text and the references to safety and security as they are covered in indicator 4.1.10.</p> <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> |

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|  | <p>Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p> <p>A 'competent person' is defined under employer responsibilities. This is regulated by provincial and federal authorities.</p> <p>Evidence: Forests Act contraventions - Open Government; AAFMP; <a href="https://www.alberta.ca/employer-responsibilities#:~:text=Alberta's%20Occupational%20Health%20and%20Safety,providing%20competent%20supervisors">https://www.alberta.ca/employer-responsibilities#:~:text=Alberta's%20Occupational%20Health%20and%20Safety,providing%20competent%20supervisors</a></p>   |   |
|  | <p>Indicator 4.1.10</p> <p>'- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</p> <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p> | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> |

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|  | <p>Indicator 4.2.1</p> <p>'- This assessment of this indicator contradicts itself in relation to indicators 4.2.4, 4.2.5, &amp; 4.2.6. The context of this indicator specifies "the focus of this Indicator is to ensure that the identification and avoidance of negative social and community impacts are incorporated into forest management planning through a consultation process with stakeholders who may be impacted."</p> <p>4.2.4 - Legal, Customary, &amp; Traditional Tenure / Use Rights is labelled as low risk for Private Land</p> <p>4.2.5 - Grievance &amp; Dispute Mechanisms - Forestry is labelled as low risk for both subscopes</p> <p>4.2.6 - Consultation &amp; Accommodation is labelled as low risk for both subscopes</p> <p>- The rationale for risk designation in 4.2.6 specifies that there is no asserted tenure, land use rights, or requirements for consultation / accommodation on private lands, and therefore low risk. This should be a consistent risk designation for related indicators.</p> <p>- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</p> <p>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania, Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's.</p> | <p>Please note that we have revised the risk rating from <i>low risk</i> to <i>specified risk</i> for indicators 4.2.6 and 4.2.4, which relate directly to Indigenous rights and governance. This change reflects the complexity of the issues and the limited availability of reliable data concerning Indigenous rights and governance and the need for meaningful engagement.</p> |
|  | <p>Indicator 4.2.4</p>   | <p>Thank you for your valuable comments. Given the factors listed, the risk associated with this indicator is designated as specified on</p>   |

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|  | <p>'- 4.2.6 Consultation / Accommodation is the mechanism to identify, document and respect/mitigate impacts to indigenous peoples and local communities as they relate to industry activity on Crown land.</p> <ul style="list-style-type: none"> <li>- All forest tenure licensees must abide by The Aboriginal Consultation Office document—The Government of Alberta’s Proponent Guide to First Nations and Métis Settlements Consultation Procedures to obtain adequacy of consultation with First Nations and Metis to harvest on an annual basis.</li> <li>- Without evidence of a successful claim, there is no mechanism by which the forest sector may re-examine land use decisions impacting treaty rights. The forest sectors management and development of natural resources is subject to its legal and constitutional duty to consult with First Nations. We highly recommend a reevaluation of this indicator after sufficient consultation with the appropriate Ministry, as listed.</li> <li>- Claims in the court system makes the assertion that forestry is guilty of violating indigenous peoples traditional use rights before rulings have been made. Additionally, those claims are against the government of Alberta and its ability to manage for cumulative effects (Duncans First Nation &amp; Beaver Lake Cree Nation) of all activities, development, and projects in the province, the Alberta Sovereignty Act and Critical Infrastructure Defense Act (Onion Cree First Nation), bears little relevance to forestry activities.</li> <li>- The Ministry of Indigenous Relations was not consulted on this indicator.</li> </ul> <p>Evidence: Action on UN Declaration on the Rights of Indigenous Peoples   Alberta.ca; First Nations agreements   Alberta.ca; Indigenous Relations   Alberta.ca; Indigenous consultation templates and forms   Alberta.ca</p> | <p>Crown land. SBP acknowledges the importance of Indigenous rights and governance in Canada. However, due to the breadth of communities and organizations across the country, SBP is not currently in a position to engage directly with all Indigenous groups. This reinforces the need for ongoing collaboration and guidance from provincial and national authorities to ensure responsible sourcing that aligns with Indigenous rights and governance</p> |
|  | <p>Indicator 4.2.7</p> <p>'- Implementation is the same in both sub-scopes as seen in the Listing of Historic Resources mapping as it is not limited to Crown land but also overlaps areas of private land (white area).</p> <ul style="list-style-type: none"> <li>- Relating to lack of publicly available evidence to support implementation mechanism, monitoring and / or results</li> <li>- Suggest working body re-evaluates the validity of publicly available data as a requirement of the risk evaluation framework. This has not been applied consistently across other Regional Risk Assessments. Examples include: "(iv) current situation on compliance if the information was available." This is referenced from the SBP-endorsed Regional Risk Assessment for Lithuania,</li> </ul>   | <p>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p>  |

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|                             | <p>Estonia, Denmark, Latvia. The 'Canadian province of Quebec' Regional Risk Assessment does not reference a risk evaluation framework or classification methodology. The US - Primary Sourcing Regions Regional Risk Assessments risk evaluation framework reads "at least two analytical methods were mobilized, including analysis of any applicable laws and qualitative analysis, to yield the most robust conclusion related to risk". The approach taken by the working body in this RRA (and RRA's other parts of Canada) is inconsistent with all other RRA's approved by SBP. Information available in the public domain should be removed as part of the risk evaluation framework in order to be consistent with the approach taken by other working bodies in other RRA's. Evidence: Listing of Historic Resources</p>   |   |
| <p>Certification scheme</p> | <p>Section 1 – Introduction</p> <p>There is no evidence that any Indigenous Peoples were included in the engagement process.</p> <p>PEFC Canada expresses significant concern that the regional risk assessment procedure lacks sufficient guidance to ensure the development of a consistent and credible risk assessments for the province. The duplication of evaluations disregards the long-established, internationally recognized, and widely adopted forest certifications commonly used in the forest industry nationwide. Furthermore, the rationale for conducting risk assessments at the provincial level is unclear, particularly given the substantial overlap and redundancy among assessments across provinces. This document does not demonstrate an open, transparent, or inclusive approach and appears to have been developed with limited input from key stakeholders and industry experts. Extremely concerning is that there is no evidence of involvement of Indigenous Peoples in the engagement process. Given the unique relationships to the land, Aboriginal title and rights, and treaty rights, Indigenous Peoples should be recognized in all aspects of SFM.</p> <p>This process duplicates existing risk assessments already conducted through other certification frameworks, such as Sustainable Forest Management (SFM) and Chain of Custody (CoC) certifications widely recognized in the forest industry in Alberta and across Canada.</p> <p>Furthermore, considering that fibre often crosses provincial boundaries a Canada-wide risk assessment would align better with fibre sourcing practices and meet RED II requirements more effectively than a province-specific approach.</p> | <p>Thank you for your comment. SBP is committed to support the interoperability of certification systems to reduce the burden to operators in the value chain of biomass. With this objective, SBP has developed and published a Benchmarking and Recognition procedure. The results of the benchmarking of PEFC scheme is available on the SBP website. Standard 2 detail how PEFC-certified feedstock is accepted within SBP certified value chain.</p> <p>In order to ensure a rigorous process and harmonisation between countries, SBP conducts RRA at regional level despite existing assessment and certification schemes.</p> <p>We acknowledge your comments on national versus regional assessment, and SBP will evaluate whether a national Regional Risk Assessment would be meaningful and aligned with our processes.</p> |

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|                            | <p>Notably, the FSC Canada National Risk Assessment (CNRA) provides a more comprehensive analysis of fibre sourcing risks.</p> <p>The SBP risk assessment could have been streamlined by recognizing fibre sourced through existing certifications as compliant with its requirements. This approach would reduce redundancy, particularly given that most of Alberta's forest land base is already certified under SFM standards (FSC and two PEFC-endorsed standards: CSA and SFI), and most forest companies possess CoC certification and/or fibre sourcing certification which addresses risk of sourcing fibre from unacceptable sources.</p> <table border="1" data-bbox="459 475 1272 667"> <tr> <td data-bbox="459 475 728 667"><b>Processing residues</b></td> <td data-bbox="728 475 1019 667">Not certified to an SBP-recognised certification scheme</td> <td data-bbox="1019 475 1272 667">Evidence to prove 'processing residues' feedstock category, AND<br/><br/>SBE + Risk Management for specified risks<br/>OR<br/>RRA + Risk Management for specified risks</td> </tr> <tr> <td></td> <td data-bbox="728 667 1019 850">Certified to an SBP-recognised certification scheme</td> <td data-bbox="1019 667 1272 850">Evidence to prove 'processing residues' feedstock category, and that the feedstock is certified by an SBP-recognised certification scheme</td> </tr> </table> <p><b>3.3</b> Depending on the source of feedstock, the Organisation shall develop and implement all, parts or none, of the elements of an SBE in accordance with the following:</p> <ul style="list-style-type: none"> <li>a. Supply Base Verifiers (SBVs) (see section 5 below) and/or</li> <li>b. Risk Assessment and Risk Ratings (see section 6 below) and/or</li> <li>c. Risk Management Plan (RMP) containing Risk Management Measures (RMM) (see section 7 below).</li> </ul> | <b>Processing residues</b>   | Not certified to an SBP-recognised certification scheme | Evidence to prove 'processing residues' feedstock category, AND<br><br>SBE + Risk Management for specified risks<br>OR<br>RRA + Risk Management for specified risks |  | Certified to an SBP-recognised certification scheme | Evidence to prove 'processing residues' feedstock category, and that the feedstock is certified by an SBP-recognised certification scheme |  |
| <b>Processing residues</b> | Not certified to an SBP-recognised certification scheme  | Evidence to prove 'processing residues' feedstock category, AND<br><br>SBE + Risk Management for specified risks<br>OR<br>RRA + Risk Management for specified risks  |   |   |  |   |   |  |
|                            | Certified to an SBP-recognised certification scheme  | Evidence to prove 'processing residues' feedstock category, and that the feedstock is certified by an SBP-recognised certification scheme  |   |   |  |   |   |  |
|                            | <p>Section 2 - Regional background and statement of scope</p> <p>The selection of scope and sub-scope is flawed. The scope should reflect the scope of where the fibre is sourced. For example, since most fibre is coming from sawmills as residue, the risk assessment needs to consider the source of the logs. Given that there is significant Alberta-BC cross boundary transportation of logs and other fibre as well as some sourcing from the US, it would have been more appropriate to consider the scope at a national level which would be consistent with other risk assessments. This would also eliminate redundancy in the risk assessment, ensure a consistent approach across all of Canada, and be consistent with risk assessments in other</p>  | <p>Thank you for your comment. Scoping is a key component of the development of the Risk Assessment and is described in the RRA Procedure</p> <p>4.3.2 WB shall define the scope or sub-scopes for each indicator. Sub-scopes may be used when different regional characteristics indicate a non-homogeneous risk distribution. Sub-scoping can apply to one of several Indicators. Key considerations include</p> |   |   |  |   |   |  |

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|  | <p>jurisdictions. While at first glance, it may seem reasonable to select sub-scope based on land ownership, e.g. Crown land vs private land, this does not represent a homogeneous risk as there are different management strategies within those groups. A more appropriate stratification would be to consider SFM certification and stratify by certified and uncertified. Uncertified land represents a significantly higher risk of non-conformance with the indicators than certified land and should be assessed separately.</p>   | <p>jurisdictional boundaries at the country, state, or regional levels, public vs private ownership, natural forests vs semi-natural or planted forests vs plantations, and certified vs uncertified areas alongside ecoregions.</p> <p>The responsibility on sub-scope falls on the Working Body who shall justify it.</p> <p>Further guidance on sub-scoping is give in SBP Guidance to Standard 2 indicator 3.5 (pp 9-11).</p>  |
|  | <p>Section 3 – Methodology</p> <p>Section 3.1 (p. 12)-The methodology described confuses risk assessment with a due diligence system indicating a flawed understanding of risk assessment which is a component of a broader due diligence system that also includes risk mitigation. While the text indicates that FSC processes related to national risk assessments were considered in the risk evaluation framework, there are other well developed due diligence systems such as those incorporated into the requirements for FSC, PEFC and SFI COC, and for the FSC controlled wood and SFI Fibre Sourcing standards. From review of the described methodology and the detailed risk assessment, it is not evident that the risk assessment followed the SBP guidance of the Risk Evaluation Framework described in the Guidance for SBP Standard 2: Feedstock Verification or any other DDS framework. To accurately assess the risk, the analysis needs to consider the indicator, what elements (e.g. IFLs) of the indicator may be at risk, the probability of the indicator or its elements that may be impacted (e.g. location in relation to fibre sourcing activities for specific IFLs) and whether or not some protection exists (e.g. deferrals). Table 1 describes the type of information gathered for each of the 42 indicators in the risk assessment. While this is what is described in Guidance for SBP Standard 2: Feedstock Verification, the guidance itself applies to evaluation at the organizational level rather than more broadly at a regional level. The approach to the risk assessment should have been modified to reflect that. Further, the RRA does not include any discussion of implementation mechanisms at the organizational level although certified sustainable forest management systems could be considered to meet that at a site level. Section 4 Regional Background (p.19) This is a very lengthy section. While the scope of the risk assessment does not consider ecological differences, the report includes detailed information on the ecology of forests in Alberta included in 4.2 Ecological Overview. Much of the information in this section could be deleted</p> | <p>Thank you for your comments. The Methodology followed by the WB is in line with the SBP Regional Risk Assessment Procedure and SBP Standard 2 and guidance. Conformity with the methodology was verified all along the process. Please refer to the REF as described in Guidance to Standard 2, p.24.</p> <p>The benchmarking and recognition process is used to benchmark and recognise external schemes such as FSC or PEFC. The result of these benchmarks are published on the SBP website. These documents identify for which indicator of the SBP Standard 1, certification against FSC or PEFC Forest Management certification provide adequate mitigation measures to identified specified risks, including at site level. In other word, if a forest is FSC or PEFC certified, the certification is a recognised mitigation measure should a specified risk be identified. Only a certain indicator not covered by FSC or PEFC would require development of dedicated mitigation measures (as certification against FSC or PEFC would not be sufficient to mitigate such risks).</p> |

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without impacting the report. Any information relevant to the evaluation of specific indicators should be incorporated directly into that indicator’s risk assessment. Annex 1: Detailed findings for indicators (p. 47) Format of Risk Assessment: The presentation and length of the assessment and analysis makes the RRA difficult to read and interpret and certainly the consultation process is inadequate to properly provide comment on the risk assessment.

Table 1: Information Gathering Requirements

|                                  | Information Gathered – by Sub-scope   |
|----------------------------------|---|
| <b>Regulatory Framework</b>      | Acts, Regulations, policy, and/or required best management practices specific to the threat/impact to the Indicator.  |
| <b>Implementation Mechanisms</b> | Mechanisms by which the organisation completing the forest management activity can demonstrate implementation and compliance with the regulatory requirement &/or best management practices that address the threat/impact.   |
| <b>Oversight Framework</b>       | Enforcement and/or monitoring framework of Acts, Regulations, policy, and/or required best management practices specific to the threat/impact to the Indicator.   |
| <b>Results</b>                   | Verification of a compliance/enforcement and/or monitoring framework.<br>Quantifiable or qualifiable results of current condition, including but not limited to: <ul style="list-style-type: none"> <li>• Monitoring results</li> <li>• Inventory &amp;/or analysis</li> <li>• Compliance &amp; enforcement results</li> <li>• Assessment reports</li> <li>• External agency reports</li> <li>• Publicly available data and/or websites</li> <li>• Expert &amp;/or Stakeholder information/results</li> </ul> |

### Use of references:

Most of the references under the heading “Other:” in the detailed tables in Annex 1 are outside the scope of a level A assessment and should not be included. Further, in most cases, there is no evidence that they contributed to the analysis.

### Section 4 - Stakeholder consultation

As this is a new risk assessment, and there are concerns with lack of stakeholder comments on previous RRAs highlights a more robust process should have been implemented to ensure the effectiveness of the engagement process. This underscores the need for substantial improvements in stakeholder consultation and outreach efforts to ensure meaningful participation and feedback. Key stakeholder e.g., SFI were not included in the current consultation process (note that the SFI series of standards, are endorsed by PEFC ). Additionally, the format provided for

Thank you for your comment which we will consider as part of the lessons learnt from this series of RRA development.

## Annex 5 Stakeholder consultation report

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|  | <p>consultation submissions was insufficient for stakeholders to provide a detailed and comprehensive response. A 30-day timeline is inadequate for reviewing and responding to such an extensive document particularly given that there were multiple risk assessments issued at the same time with the same consultation period. For comparison, the FSC NRA process allows a 60-day period, providing a more reasonable timeframe for meaningful input.</p>  |  |
|  | <p>Section 5 – Conclusions<br/>Section 5 – Conclusions does not exist in the report. Further, the sections as outlined in this consultation template do not reflect the structure of the Regional Risk Assessment Report. This has made it difficult to provide meaningful input into the consultation process.</p>   | <p>Thank you for your comment. Formatting and title of sections will be verified at the time of publication.</p>   |
|  | <p>Annex 1: Detailed findings for indicators (p. 47)<br/>Format of Risk Assessment:<br/>The presentation and length of the assessment and analysis makes the RRA difficult to read and interpret and certainly the consultation process is inadequate to properly provide comment on the risk assessment. As a result, we provide the following comments as a summary to illustrate our concern with the assessment and the process. However, this is not an exhaustive list of the weaknesses that we have identified. See also comments under BC for Indicator 1.1.1.</p> | <p>Thank you for your comment which we will consider as part of the lessons learnt from this series of RRA development Your comments which have been passed on to the Working Body.</p>  |
|  | <p>Annex 2 - List of experts consulted and contacts of Working Body<br/>It is a matter of concern that the list of experts lacks individuals with expertise in Sustainable Forest Management (SFM) and chain of custody certification, as well as industrial foresters who possess practical, on-the-ground experience. In addition, the Working Body had no Indigenous representatives on it and there appears to be no consultation or outreach with Indigenous organizations.</p>  | <p>Thank you for your comment. The experts have participated to the development of the Regional Risk Assessment. To ensure a broad range of views to be included in the final version of the RRA before publication a public consultation is open with announcement made by the Working Body and SBP. The Working Body is required to reach out to the parties listed in section 5.4 of the RRA Procedure. This is a control point reviewed by SBP before allowing the finalisation of the report and its publication. In addition, the RRA is reviewed by a local expert and SBP Technical Committee before approval.</p> |
|  | <p>Annex 3 - List of publications used<br/>The list of publications should be formally referenced with proper titles and sources. It also lists items that are not specific publications, such as organizations.</p>  | <p>Thank you for your comment which we will consider as part of the lessons learnt from this series of RRA development.</p>  |

## Annex 5 Stakeholder consultation report

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|  | <p>Annex 4 - List of stakeholders</p> <p>No stakeholders are specifically listed. However, it lists categories including “official representatives of forestry certification schemes”. It has come to our attention that the Sustainable Forestry Initiative was not consulted and most of the certified forests in BC are SFI SFM certified. This seems to be an egregious oversight.</p> <p><b>5.10</b> The WB Co-ordinator is responsible for facilitating culturally appropriate outreach to representatives of all identified stakeholders.</p>  | <p>SBP nor the Working Body publishes list of the organisations reached out during the public consultation for obvious confidentiality reasons.</p>  |
|  | <p>Annex 5 - Stakeholder consultation report</p> <p>This section has not been completed, as a result, it is not possible to ascertain if the stakeholder consultation process was adequate. Given that the previous version of the RRA received no stakeholder comments, more effort should be placed on stakeholder identification and engagement. A particular concern is for consultation and engagement with Indigenous representatives.</p> <p><b>6.4 SBP public stakeholder consultation</b></p> <p><b>6.4.1</b> On receipt of a positive recommendation from the TC’s initial review, SBP shall undertake a public stakeholder consultation. The Final Draft RRA Report will be published on the SBP website with an invitation for interested parties to submit written comments on both the Final Draft RRA Report and the RRA Procedure followed. The consultation period shall be for a minimum of thirty (30) days.</p> | <p>SBP nor the Working Body publishes list of the organisations reached out during the public consultation for obvious confidentiality reasons.</p> <p>Annex 5 will be compiled ahead of publishing the Interim RRA.</p> |
|  | <p>Annex 6 - REDII Level A risk assessment</p> <p>Given the weaknesses in the regional risk assessment process, we anticipate that there will be similar flaws in the RED II Level A risk assessment.</p> <p>For example, the assessment of legality is flawed as a load ticket (TM9) is required prior to transporting logs and this applies to both Crown and private land. There are also provincial and federal regulations that apply to private land.</p>   | <p>Thank you for your comment. Without specific details, the comment cannot be upheld.</p>   |

### Sustainable harvesting criteria 29(6)

The country in which forest biomass was harvested has national or sub-national laws applicable in the area of harvest as well as monitoring and enforcement systems in place ensuring:

#### (i) The legality of harvesting operations

##### Step 1: Identification of applicable laws

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|--|--|
| <i>Have the applicable law(s) been identified?</i> | <ul style="list-style-type: none"> <li>✓ Yes - Sub-scopes: Crown Land</li> <li>✓ No, Level B route is required</li> </ul>  |
| <i>List of applicable law(s)</i>                   | <p><u>Crown Land</u></p> <ul style="list-style-type: none"> <li>• Forests Act</li> <li>• Timber Management Regulation</li> </ul> <p><u>Private Land</u></p> <p>There is no regulatory framework for timber harvest on private land.</p>  |
| <i>Sources</i>                                     | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> </ul> |

##### Step 2: Description of enforcement and monitoring

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|---|--|
| <i>Description of the practical implementation of the law(s)</i>            | <p><u>Crown Land</u></p> <p>Ministry of Forestry and Parks (MFP) monitors the legality of harvesting operations through its Forest Operations Monitoring Program (FOMP), which is certified to the ISO 9001:2015 quality management system standard. FOMP inspections are directly linked to the Alberta Timber Harvest Planning and Operating Ground Rules (OGR). MFP encourages self-reporting by companies and individuals. Timber disposition holders monitor forest management activities through inspections of operating ground rule compliance. Timber disposition holders are required to produce Stewardship Reports reported every five years. Stewardship Reports include results of compliance and adherence to VOITs.</p> <p><u>Private Land</u></p> <p>On private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework on private land.</p> |
| <i>Sources</i>  | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management – Overview Website</a></li> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Forests Act Contraventions</a></li> <li>• MFP FOMP Inspection Data 2018 – 2023</li> </ul>   |
| <i>Is the enforcement and monitoring ensured for the identified law(s)?</i> | <ul style="list-style-type: none"> <li>✓ Yes - Sub-scopes: Crown Land</li> <li>✓ No, Level B route is required for Sub-scope: Private Land</li> </ul>  |

**Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting**

|   |  |
|---|--|
| <p><i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i></p> | <p><u>Crown Land</u><br/>There is a comprehensive regulatory framework governing the legality for timber harvesting on Crown land. There are well described operational guidelines for harvesting related to soil erosion, compaction, and rutting. The government monitors harvest blocks for compliance. MFP FOMP data verify compliance with practice requirements related to soil quality. Based on evidence reviewed, the legal framework is effective for Crown land in Alberta.</p> <p><u>Private Land</u><br/>Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition, a precautionary approach is applied. Based on evidence reviewed, the legal framework is not effective for private land in Alberta.</p> |
| <p><i>Sources</i></p>   | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management – Overview Website</a></li> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Forests Act Contraventions</a></li> <li>• MFP FOMP Inspection Data 2018 – 2023</li> </ul>   |
| <p><i>Is the legal framework effective?</i></p>   | <p>✓ Yes - Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p>   |

**(ii) Forest regeneration of harvested areas**

**Step 1: Identification of applicable laws**

|   |  |
|---|--|
| <p><i>Have the applicable law(s) been identified?</i></p> | <p>✓ Yes - Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p>   |
| <p><i>List of applicable law(s)</i></p>                   | <p><u>Crown Land</u></p> <ul style="list-style-type: none"> <li>• Forests Act</li> <li>• Timber Management Regulation</li> </ul> <p><u>Private Land</u></p> <p>There is no regulatory framework for timber harvest on private land.</p>  |
| <p><i>Sources</i></p>                                     | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> </ul> |

**Step 2: Description of enforcement and monitoring**

|  |  |
|--|--|
| <p><i>Description of the practical implementation of the law(s)</i></p>            | <p><u>Crown Land</u><br/>MFP monitors regeneration activities through its FOMP, which is certified to the ISO 9001:2015 quality management system standard. FOMP inspections are directly linked to the OGRs. There are two levels of monitoring in the FOMP: timber disposition holder monitoring and MFP monitoring. FOMP inspections are conducted on harvesting operations, road construction and silviculture activities. FOMP procedures require a minimum target for inspections. Frequency of inspections can be increased based on results of previous inspections, and/or through a risk-rating protocol. FOMP results are compiled annually and MFP verifies compliance levels. Timber disposition holders and/or MFP identify non-conformances through non-conformance reporting at the applicable levels of FOMP monitoring. A corrective action plan must be submitted and approved by MFP for all non-conformances to minimise the risk of re-occurrence. MFP is responsible for the oversight and approval of Alberta Regeneration Information System submissions. Timber disposition holders must report silviculture activities into the system by May 15 each year for review and approval by MFP.</p> <p><u>Private Land</u><br/>On private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework for regeneration on private land.</p> |
| <p><i>Sources</i></p>  | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2019-2020</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2018-2019</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2017-2018</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2016-2017</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Forests Act Contraventions</a></li> <li>• MFP FOMP Inspection Data 2018 – 2023</li> <li>• <a href="#">Regeneration – National Forestry Database</a></li> <li>• <a href="#">Reforestation Standard of Alberta</a></li> </ul>   |
| <p><i>Is the enforcement and monitoring ensured for the identified law(s)?</i></p> | <p>✓ Yes - Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p>   |

**Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting**

|   |  |
|---|--|
| <p><i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i></p> | <p><u>Crown Land</u><br/>There is a comprehensive regulatory framework governing regeneration on Crown land. Silviculture activities are reported annually and are monitored by MFP. The Annual Reforestation Report in Alberta and FOMP data verified timber disposition holders comply with regeneration requirements. Based on evidence reviewed, the legal framework is effective for Crown land in Alberta.</p> <p><u>Private Land</u><br/>Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of regeneration following timber harvesting, a precautionary approach is applied. Based on evidence reviewed, the legal framework is not effective for private land in Alberta.</p> |
| <p><i>Sources</i></p>   | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> </ul>  |

## Annex 6 REDII Level A risk assessment

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2019-2020</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2018-2019</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2017-2018</a></li> <li>• <a href="#">Annual Status of Reforestation in Alberta Report 2016-2017</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Forests Act Contraventions</a></li> <li>• MFP FOMP Inspection Data 2018 – 2023</li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Regeneration – National Forestry Database</a></li> <li>• <a href="#">Reforestation Standard of Alberta</a></li> </ul> |
| <i>Is the legal framework effective?</i> | <ul style="list-style-type: none"> <li>✓ Yes - Sub-scopes: Crown Land</li> <li>✓ No, Level B route is required for Sub-scope: Private Land</li> </ul>   |

**(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes**

### Step 1: Identification of applicable laws

|  |   |
|--|---|
| <i>Have the applicable law(s) been identified?</i> | <ul style="list-style-type: none"> <li>✓ Yes – Sub-scopes: Crown Land &amp; Private Land</li> <li>• No, Level B route is required</li> </ul>  |
| <i>List of applicable law(s)</i>                   | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• Species at Risk Act (SARA)</li> <li>• Migratory Birds Convention Act</li> <li>• Fisheries Act</li> <li>• Canada National Parks Act</li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• Alberta Land Stewardship Act (ALSA)</li> <li>• Forests Act</li> <li>• Wildlife Act</li> <li>• Wildlife Act Regulation</li> <li>• Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act</li> <li>• Provincial Parks Act</li> </ul>   |
| <i>Sources</i>                                     | <p><u>Federal</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Canada National Parks Act</a></li> <li>• <a href="#">Environment and Climate Change Canada</a></li> <li>• <a href="#">Fisheries Act</a></li> <li>• <a href="#">Migratory Birds Convention Act</a></li> <li>• <a href="#">Species at Risk Act</a></li> </ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>• <a href="#">Alberta Land Stewardship Act</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Land-use Secretariat Landuse Regional Plans</a></li> <li>• <a href="#">Provincial Parks Act</a></li> <li>• <a href="#">Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangeland Act</a></li> <li>• <a href="#">Wildlife Act</a></li> <li>• <a href="#">Willmore Wilderness Park Act</a></li> </ul> |

**Step 2: Description of enforcement and monitoring**

|   |   |
|---|---|
| <i>Description of the practical implementation of the law(s)</i>            | At the federal level, Committee on the Status of Endangered Wildlife in Canada (COSEWIC) oversees SARA species, critical habitats and updates SARA listings annually. Fisheries and Ocean’s Canada (DFO) oversees the Fisheries Act, Environment and Climate Change Canada (ECCC) oversees the MBCA, and Parks Canada oversees the Canada National Parks Act. At the provincial level, the Land-use Secretariat has oversight of the development and coordination of regional land use planning including new conservation areas. At the provincial level, ESCC, under Ministry of Environment and Protected Areas (MEPA) oversees the species at risk including the federal SARA, Alberta Wildlife Act. MEPA and Alberta Conservation Information Management System (ACIMS) oversees RTE ecosystems. MEPA oversees conservation and protected areas under the Wilderness Areas, Ecological Reserves, Natural Area, and Heritage Rangelands Act. MFP oversees provincial parks under the Provincial Parks Act. MFP under the Forests Act oversees planning and practices related to biodiversity values. ABMI oversees Biodiversity Intactness Index, wetland inventory, and species occurrence mapping, whereas fRI Research oversees the Healthy Landscape Program. |
| <i>Sources</i>  | See listing above in Step 1 Sources for Crown land and private land.  |
| <i>Is the enforcement and monitoring ensured for the identified law(s)?</i> | ✓ Yes – Sub-scopes: Crown Land & Private Land<br>• No, Level B route is required  |

**Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting**

|  |   |
|--|---|
| <i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i> | There is a comprehensive federal and provincial regulatory framework for nature protection purposes. Government agencies following protocols and experts identify/designate protected areas, specific to the protection needs. Government agencies provide applicable and competent oversight on protected areas. Government agencies websites provide publicly available information that defines the protected areas, requirements and restrictions. Protected areas are spatially defined and excluded from crown land and private land management units. Based on evidence reviewed, the legal framework is effective for Crown land and private land in Alberta. |
| <i>Sources</i>   | See listing above in Step 1 Sources for Crown land and private land.  |
| <i>Is the legal framework effective?</i>   | ✓ Yes – Sub-scopes: Crown Land & Private Land<br>• No, Level B route is required  |

**(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts**

**Step 1: Identification of applicable laws**

|  |  |
|--|--|
| <i>Have the applicable law(s) been identified?</i> | <u>Soil Quality</u><br>✓ Yes – Sub-scopes: Crown Land<br>✓ No, Level B route is required for Sub-scope: Private Land<br><u>Biodiversity</u><br>✓ Yes – Sub-scopes: Crown Land<br>✓ No, Level B route is required for Sub-scope: Private Land |
| <i>List of applicable law(s)</i>                   | <u>Soil Quality</u><br><u>Crown Land</u> <ul style="list-style-type: none"> <li>• Forests Act</li> <li>• Timber Management Regulation</li> </ul>   |

## Annex 6 REDII Level A risk assessment

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|----------------|--|
|                | <ul style="list-style-type: none"><li>• Public Lands Act</li></ul> <p><u>Private Land</u></p> <p>There is no regulatory requirements to manage or maintain soil quality or for biodiversity on private land.</p> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"><li>• See listing below in Step 1 Sources for Crown land and private land.</li></ul>   |
| <i>Sources</i> | <p><u>Soil Quality</u></p> <ul style="list-style-type: none"><li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li><li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li><li>• <a href="#">Forests Act</a></li><li>• <a href="#">Timber Management Regulation</a></li></ul> <p><u>Biodiversity</u></p> <p><u>International</u></p> <ul style="list-style-type: none"><li>• <a href="#">Global Forest Watch</a></li><li>• <a href="#">HCV Resource Network</a></li><li>• <a href="#">HCV Resource Network Common Guidance for the Identification of High Conservation Values.</a></li><li>• <a href="#">Intact Forest Landscapes, map</a></li><li>• <a href="#">IUCN Globally Threatened Ecosystems</a></li><li>• <a href="#">Nature Serve Canada</a></li><li>• <a href="#">NatureServe Conservation Status categories</a></li><li>• <a href="#">Shape of Nature Globally threatened ecosystems</a></li></ul> <p><u>Federal</u></p> <ul style="list-style-type: none"><li>• <a href="#">2020 Wild Species Report</a></li><li>• <a href="#">Canada National Parks Act</a></li><li>• <a href="#">Environment and Climate Change Canada</a></li><li>• <a href="#">Fisheries Act</a></li><li>• <a href="#">Migratory Birds Convention Act</a></li><li>• <a href="#">Species at Risk Act</a></li><li>• <a href="#">Species at Risk Public Registry</a></li><li>• <a href="#">sffsdfds</a></li></ul> <p><u>Provincial</u></p> <ul style="list-style-type: none"><li>• <a href="#">ABMI - Status of Human Footprint in Alberta</a></li><li>• <a href="#">ABMI Wetland Inventory</a></li><li>• <a href="#">ABMIGC ABMI Wetland Inventory</a></li><li>• <a href="#">Alberta Conservation Information Management System - Ecological Community Tracking List</a></li><li>• <a href="#">Alberta Ecological Classification System</a></li><li>• <a href="#">Alberta field guides to ecosites</a></li><li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li><li>• <a href="#">Alberta Grizzly Bear Recovery Strategy (2020)</a></li><li>• <a href="#">Alberta Land Stewardship Act</a></li><li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li><li>• <a href="#">Alberta Woodland Caribou Recovery Plan 2004/05 - 2013/14</a></li><li>• <a href="#">fRI Research</a></li><li>• <a href="#">Land-use Secretariat Landuse Regional Plans</a></li><li>• <a href="#">Provincial Parks Act</a></li><li>• <a href="#">Species at Risk Assessed in Alberta</a></li><li>• <a href="#">Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangeland Act</a></li><li>• <a href="#">Wildlife Act</a></li></ul> |

## Annex 6 REDII Level A risk assessment

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>• <a href="#">Willmore Wilderness Park Act</a></li> <li>• <a href="#">Alberta Environment and Protected Areas. Status of Provincial Recovery Plans. April 2023.</a></li> </ul> <p>Other</p> <ul style="list-style-type: none"> <li>• <a href="#">Ducks Unlimited Forest Management Wetland Stewardship Initiative</a></li> </ul> |
|--|---|

### Step 2: Description of enforcement and monitoring

|   |   |
|---|---|
| <i>Description of the practical implementation of the law(s)</i>            | <p><u>Provincial</u><br/>The provincial Land-use Secretariat for Alberta has oversight of the development and coordination of regional land use planning including new conservation areas. MEPA is responsible for oversight of implementation of the Wildlife Act.</p> <p><u>Crown Land</u><br/>MPF reviews and approves timber disposition holders' Forest Management Plans (FMPs), General Development Plans, Annual Operating Plans and Stewardship Reports. MFP monitors soil conservation and biodiversity values through FOMP, which is certified to the ISO 9001:2015 quality management system standard. FOMP inspections are directly linked to the OGR. MFP encourages self-reporting by companies and individuals. Timber disposition holders monitor soil conservation activities and biodiversity values through inspections of related operating ground rule compliance. Timber disposition holders are required to produce Stewardship Reports reported every five years. Stewardship Reports include the incidence of compaction, rutting, erosion, and biodiversity values through adherence to VOITs.</p> <p><u>Private Land</u><br/>On private land, owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight framework to manage or maintain soil quality or for biodiversity on private land.</p> |
| <i>Sources</i>  | <p><u>Soil Quality</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management – Overview Website</a></li> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Forests Act Contraventions</a></li> <li>• MFP FOMP Inspection Data 2018 – 2023</li> <li>• <a href="#">Soil Conservation Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Water Act</a></li> </ul> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>• See listing above in Step 1 Sources for Crown land and private land.</li> </ul>   |
| <i>Is the enforcement and monitoring ensured for the identified law(s)?</i> | <p><u>Soil Quality</u></p> <p>✓ Yes – Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p> <p><u>Biodiversity</u></p> <p>✓ Yes – Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p>   |

### Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

|   |  |
|---|--|
| <i>Evaluation of the practical implementation of the law(s)</i> | <p><u>Soil Quality &amp; Biodiversity</u></p> <p><u>Crown Land</u></p> |
|---|--|

## Annex 6 REDII Level A risk assessment

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| <p><i>and explanation for the evaluation</i></p> | <p>There is a comprehensive regulatory framework governing soil quality and biodiversity conservation for Crown land. There are operating ground rules regulating harvesting related to soil erosion, compaction, and rutting, as well as maintain biodiversity. The government monitors harvest blocks for compliance. MFP FOMP data verify compliance with practice requirements related to soil quality and biodiversity. Based on evidence reviewed, the legal framework is effective for soil conservation for Crown land in Alberta. The Crown licensees' FMP, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. In evaluating implementation mechanisms there are sections where FMP guidance is to "retain" or "maintain" or "recruit" specific elements without specific targets set in legislation or strategic level guidance. Without legislative direction or government guidance (i.e., target area, percent target or minimum requirements), there is uncertainty about the sufficiency/uniformity of implementation vis-a-vis maintenance and enhancement of biodiversity values across diverse Crown Land timber disposition holders. Government programs provide oversight and monitor regulatory planning and practices for biodiversity values. There is no indication of widespread or systemic legal non-compliance. However, government oversight is focused on legal compliance with legislation for biodiversity values but not on sufficiency relative to the maintenance and enhancement of biodiversity values. This reinforces uncertainty with respect to sufficiency/uniformity of implementation across diverse Crown Land timber disposition holders.</p> <p>The Alberta Government and other organisations have, and continue to, assess the maintenance and enhancement of landscape-level and stand-level biodiversity values. There are many assessments and reports covering different spatial and temporal scales. The results of this data, assessments, and reports are wide and varied, making it difficult to provide a definitive conclusion. Based on the extensive results, this risk assessment is unable to draw a sufficiency conclusion on the maintenance or enhancement of specific biodiversity values.</p> <p>This risk assessment does identify areas of uncertainty. In the evaluation of Crown land, the most evident areas of uncertainty for the maintenance of biodiversity values are related the following:</p> <ul style="list-style-type: none"> <li>• Woodland Caribou habitat due to the incomplete recovery plan development and/or implementation;</li> <li>• SAR recovery plans and critical habitat for identified species-at-risk are at various stages of completion;</li> <li>• Intact Forest Landscapes due to lack of provincial recognition and implementation mechanism;</li> <li>• RTE ecosystems due to no minimum protection targets; and</li> <li>• Old forests do not have government minimum targets and are not spatially permanent.</li> </ul> <p>Based on evidence reviewed, the legal framework is not effective for biodiversity on Crown land in Alberta.</p> <p><u>Private Land</u></p> <p>Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of soil quality or for biodiversity, a precautionary approach is applied. Based on the lack of evidence, the legal framework is not effective for private land in Alberta.</p> |
| <p><i>Sources</i></p>                            | <p><u>Soil Quality</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management – Overview Website</a></li> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1</a></li> <li>• <a href="#">Alberta Timber Harvest Planning and Operating Ground Rules</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Public Lands Act</a></li> <li>• <a href="#">Forests Act Contraventions</a></li> <li>• MFP FOMP Inspection Data 2018 – 2023</li> <li>• <a href="#">Soil Conservation Act</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Water Act</a></li> </ul>  |

## Annex 6 REDII Level A risk assessment

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|--|---|
|  | <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>• See listing above in Step 1 Sources for Crown land and private land.</li> </ul>   |
| <i>Is the legal framework effective?</i> | <p><u>Soil Quality</u></p> <ul style="list-style-type: none"> <li>✓ Yes – Sub-scopes: Crown Land</li> <li>✓ No, Level B route is required for Sub-scope: Private Land</li> </ul> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>✓ No, Level B route is required for Sub-scope: Crown Land &amp; Private Land</li> </ul> |

### (v) That harvesting maintains or improves the long-term production capacity of the forest

#### Step 1: Identification of applicable laws

|  |  |
|--|--|
| <i>Have the applicable law(s) been identified?</i> | <ul style="list-style-type: none"> <li>✓ Yes – Sub-scopes: Crown Land</li> <li>✓ No, Level B route is required for Sub-scope: Private Land</li> </ul>  |
| <i>List of applicable law(s)</i>                   | <p><u>Crown Land</u></p> <ul style="list-style-type: none"> <li>• Forests Act</li> <li>• Timber Management Regulation</li> </ul> <p><u>Private Land</u></p> <p>There is no regulatory framework that requires the determination and maintenance of long-term sustainable harvest levels on private land.</p> |
| <i>Sources</i>                                     | <p><u>Crown Land</u></p> <ul style="list-style-type: none"> <li>• Forests Act</li> <li>• Timber Management Regulation</li> </ul>   |

#### Step 2: Description of enforcement and monitoring

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|--|--|
| <i>Description of the practical implementation of the law(s)</i> | <p><u>Crown Land</u></p> <p>MFP reviews AACs as part of the FMPs review to ensure FMPs have been developed in a manner consistent with government direction. The FMP review process includes a review by the FMA-holder's public advisory group, which may comment on the allowable harvest level. Forest operations and harvest levels are tracked on an annual basis and consolidated into five-year quadrants as per the Timber Management Regulation production control period. A quadrant is a quarter of the term of an FMP (i.e., the first quadrant is the first five years of the plan term). The timber harvest during one quadrant cannot exceed 110% of the quadrant AAC. If the harvest exceeds the quadrant AAC, the allowable harvest in the next quadrant is reduced by the amount that the harvest exceeded the AAC. During the entire plan term, the harvest must be at or below the AAC.</p> <p><u>Private Land</u></p> <p>As of March 2024, there is no publicly available information describing an oversight framework for long-term sustainable harvest levels on private land.</p> |
| <i>Sources</i>   | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>• <a href="#">Alberta's Forest Economy 2023: A Handbook of Public Economic and Socioeconomic Accounts</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Forests Act – Revised Statutes of Alberta 2000; Chapter F-22</a></li> <li>• <a href="#">Forest Management Plans</a></li> <li>• <a href="#">Provincial Timber Harvest and Annual Allowable Cut, Alberta Crown Lands</a></li> <li>• <a href="#">Quota Production Chargeability</a></li> <li>• <a href="#">Timber Management Regulation</a></li> </ul>  |

## Annex 6 REDII Level A risk assessment

|   |   |
|---|---|
|   | <ul style="list-style-type: none"> <li>• <a href="#">Timber Production Monitoring (previously 98-05)</a></li> </ul> |
| <i>Is the enforcement and monitoring ensured for the identified law(s)?</i> | <p>✓ Yes – Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p>            |

### Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

|  |   |
|--|---|
| <i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i> | <p><u>Crown Land</u></p> <p>There is a comprehensive regulatory framework governing the determination of long-term sustainable harvest levels and regulating actual harvest volumes. Government legislation and guidance demonstrates long-term sustainable harvest levels are calculated based on applicable inventory and growth data. MFP approves long-term sustainable harvest levels, as well as monitors actual harvest levels. MFP reports and databases provide data to verify actual harvest volumes are below the long-term sustainable harvest levels. Based on evidence reviewed, the legal framework is effective for Crown land in Alberta.</p> <p><u>Private Land</u></p> <p>Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of harvest levels, a precautionary approach is applied. Based on evidence reviewed, the legal framework is not effective for private land in Alberta.</p> |
| <i>Sources</i>   | <ul style="list-style-type: none"> <li>• <a href="#">Alberta Forest Management Planning Standard - Version 4.1(2006)</a></li> <li>• <a href="#">Alberta's Forest Economy 2023: A Handbook of Public Economic and Socioeconomic Accounts</a></li> <li>• <a href="#">Forests Act</a></li> <li>• <a href="#">Forests Act – Revised Statutes of Alberta 2000; Chapter F-22</a></li> <li>• <a href="#">Forest Management Plans</a></li> <li>• <a href="#">Provincial Timber Harvest and Annual Allowable Cut, Alberta Crown Lands</a></li> <li>• <a href="#">Quota Production Chargeability</a></li> <li>• <a href="#">Timber Management Regulation</a></li> <li>• <a href="#">Timber Production Monitoring (previously 98-05)</a></li> </ul>  |
| <i>Is the legal framework effective?</i>   | <p>✓ Yes – Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required for Sub-scope: Private Land</p>  |

## Annex 6 REDII Level A risk assessment

| LULUCF criteria 29(7)   |   |
|---|---|
| <i>Paris Agreement ratified?</i>  | ✓ Yes • No  |
| <i>Submission of a relevant NDC</i>   | ✓ Yes • No  |
| <i>Sources</i>  | <p>– Paris Agreement: UNFCCC’s party information about Canada – <a href="https://unfccc.int/node/61034">https://unfccc.int/node/61034</a></p> <p>– Paris Agreement: United Nations Treaty Collection – Canada 22 Apr 2016 – <a href="https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&amp;mtdsg_no=XXVII-7-d&amp;chapter=27&amp;clang=_en">https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&amp;mtdsg_no=XXVII-7-d&amp;chapter=27&amp;clang=_en</a></p> <p>– NDC Registry: Canada – <a href="https://unfccc.int/NDCREG">https://unfccc.int/NDCREG</a></p> <p>Canada’s 2021 Nationally Determined Contribution Under The Paris Agreement – <a href="https://unfccc.int/sites/default/files/NDC/2022-06/Canada%27s%20Enhanced%20NDC%20Submission1_FINAL%20EN.pdf">https://unfccc.int/sites/default/files/NDC/2022-06/Canada%27s%20Enhanced%20NDC%20Submission1_FINAL%20EN.pdf</a></p>   |
| <i>Brief description of how agriculture, forestry and land use are accounted for in NDC</i> | <p>'Canada estimates the emissions and subsequent removals from natural disturbances on managed forest land in the LULUCF sector according to a Tier 3 country-specific method. Reported estimates for the net GHG emissions from managed forest land exclude the impacts (both emissions and subsequent removals) of non-anthropogenic natural disturbances (e.g., wildfires, windthrow and those insect infestations that cause significant (&gt;20%) tree mortality). For more information, see Canada’s NIR.' 'For the purpose of Canada’s NDC, Canada’s 2030 emissions will be its national total net emissions, including LULUCF. For all LULUCF sub-sectors except the managed forest and associated harvested wood products, Canada’s accounting approach compares net emissions in 2030 with net emissions in 2005 (often referred to as a “net-net” approach) to determine the accounting contribution to Canada’s 2030. or more information on LULUCF accounting, see Canada’s latest Biennial Report.'</p> <p>Canada considers the Paris Agreement to be in line with achieving the objective of the Convention as set out in its Article 2. Canada’s enhanced NDC is consistent with the Paris Agreement and its long-term temperature goal. See 6(a) and 6(b) for more information. Canada’s GHG emissions peaked in 2007 and are projected to be on downward trajectory. Canada’s enhanced NDC is line with Canada’s 2050 net-zero emissions target. See 6(a) and 6(b) for more information.</p> |

### OR (this option below must be used if the previous point about NDC is not satisfied)

The origin country has national or sub-national laws in place, in accordance with Article 5 of the Paris Agreement, applicable in the area of harvest, to conserve and enhance carbon stocks and sinks, and providing evidence that reported LULUCF-sector emissions do not exceed removals

#### Step 1: Identification of applicable laws

|  |                                       |
|--|---------------------------------------|
| <i>Have the applicable law(s) been identified?</i> | • Yes • No, Level B route is required |
| <i>List of applicable law(s)</i>                   |                                       |
| <i>Sources</i>                                     |                                       |

## Annex 6 REDII Level A risk assessment

### Step 2: Description of enforcement and monitoring

|   |                                       |
|---|---------------------------------------|
| <i>Description of the practical implementation of the law(s)</i>            |                                       |
| <i>Sources</i>  |                                       |
| <i>Is the enforcement and monitoring ensured for the identified law(s)?</i> | • Yes • No, Level B route is required |

### Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

|  |                                       |
|--|---------------------------------------|
| <i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i> |                                       |
| <i>Sources</i>   |                                       |
| <i>Is the legal framework effective?</i>   | • Yes • No, Level B route is required |