



Canada



Sustainable Biomass Program (SBP)

Regional Risk Assessment for British Columbia Forest Canada

SBP-RRA-CA-BC-FOR v2.0

Interim RRA

Version v2.0

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

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Abbreviations

BMP	Best management practices
CFS	Canadian Forest Service
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CoC	Chain of custody
CSA	Canadian Standards Association
CWS	Canadian Wildlife Service
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
ESDC	Employment and Social Development Canada
EU	European Union
EUTR	European Union Timber Regulation
FPIC	Free, prior and informed consent
FSC	Forest Stewardship Council
GDP	Gross domestic product
GFW	Global Forest Watch
GHG	Greenhouse gas
GMO	Genetically modified organism
HCV	High conservation value
ILO	International Labour Organization
IPCC	Intergovernmental Panel on Climate Change
ITUC	International Trade Union Confederation
IUCN	International Union for Conservation of Nature
KPI	Key performance indicator
LULUCF	Land Use, Land Use Change, and Forestry
NDC	Nationally Determined Contribution
NRCAN	Natural Resources Canada
OHS	Occupational health and safety
PEFC	Programme for the Endorsement of Forest Certification
RCMP	Royal Canadian Mounted Police
REDII	Renewable Energy Directive 2018/2001
RPF	Registered Professional Forester
RTE	Rare, threatened or endangered

SAR	Species at risk
SARA	Federal Species at Risk Act
SBP	Sustainable Biomass Program
SFI	Sustainable Forestry Initiative
UN	United Nations
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
UNDRIP Act	United Nations Declaration on the Rights of Indigenous Peoples Act
UNFCCC	United Nations Framework Convention on Climate Change
UNICEF	United Nations Children's Fund
VOITs	Values, objectives, indicators and targets
WAPPRIITA	Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act
WHMIS	Workplace Hazardous Materials Information System
WPAC	Wood Pellet Association of Canada
WWF	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-BC scope is the harvestable forest land base of British Columbia.

The Wood Pellet Association of Canada (WPAC) initiated the RRA for British Columbia (BC) in 2018 to verify the legality and sustainability of feedstock. In 2021, a RRA was endorsed for BC. 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 prepare the Public Consultation Draft RRA. The Working Body facilitated the risk assessment to ensure relevant BC laws, policies and practices, as well as practical knowledge of forestry in BC, 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 BC Ministry of Forests (FOR), and Ministry of Environment and Climate Change Strategy (MECCS), 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 forested land bases in British Columbia (BC). The RRA-BC 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 British Columbia. 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-BC as implemented by the BC 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 10: Proposed Risk Designation Summary).

As required by SBP RRA Procedures, the draft RRA-BC will be made available for Stakeholder Consultation. The SBP approach to Stakeholder Consultation is discussed in Section 3.2: Stakeholder Consultation. 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 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-BC. This section helps set the context of the bio-physical, social, and economic values in BC.

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-BC.

Once the RRA-BC is endorsed by SBP, each Biomass Producer must use the results of the RRA-BC 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.

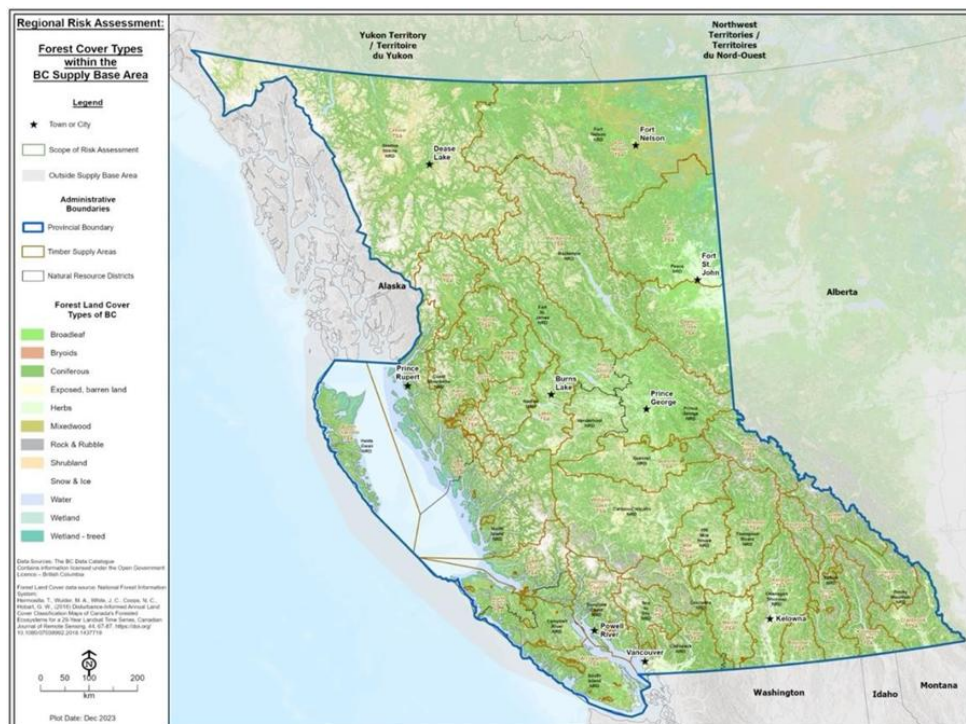
2 Regional background and statement of scope

2.1 Regional background

2.1.1 Overview Description

British Columbia's (BC's) land base is 95 million ha in size (almost 946,460 km²). BC spans 11 degrees of latitude and 25 degrees of longitude. The province is about 1,300 km from the southern coast of Vancouver Island to the northern boundary at 60° N, and along this latitude, the boundary with the Yukon and the Northwest Territories stretches almost 1,100 km. Almost 63% of the province—about 60 million hectares is covered by forests.⁴ Eighty-three per cent of the province's forests are composed of softwood species, consisting of the following commercial species: lodgepole pine, subalpine fir, white and Engelmann spruce, subalpine, grand fir, Douglas-fir, pacific silver fir, Sitka spruce, western red cedar and western hemlock.⁵ Hardwoods primarily consist of aspen and birch, with maple, alder, and oak present in coastal areas. Ecosystems and land cover in BC are diverse: mountain tops to marine estuaries and from dense forests to grassland. Figure 3 shows the distribution of forest cover types across BC.

Figure 3: Forest Cover Types in British Columbia



⁴ BC Government, [Modernizing Forest Policy in British Columbia, 2021](#).

⁵ BC Ministry of Forests, [The State of the British Columbia's Forest. Third Edition. 2010](#).

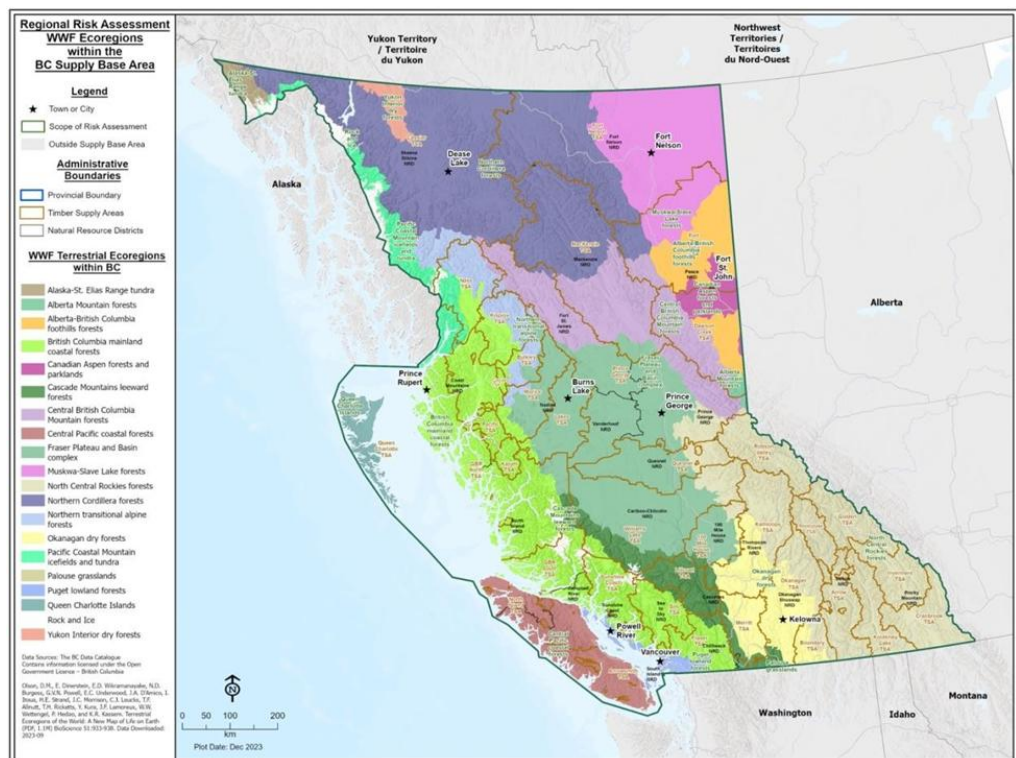
2.1.2 Ecological Overview

Ecological Classification

Global-Level Ecological Classification

British Columbia (BC) forests are described by the 19 ecoregions defined by the World Wildlife Fund (WWF). The locations and names of these ecoregions within BC are shown in Figure 4.

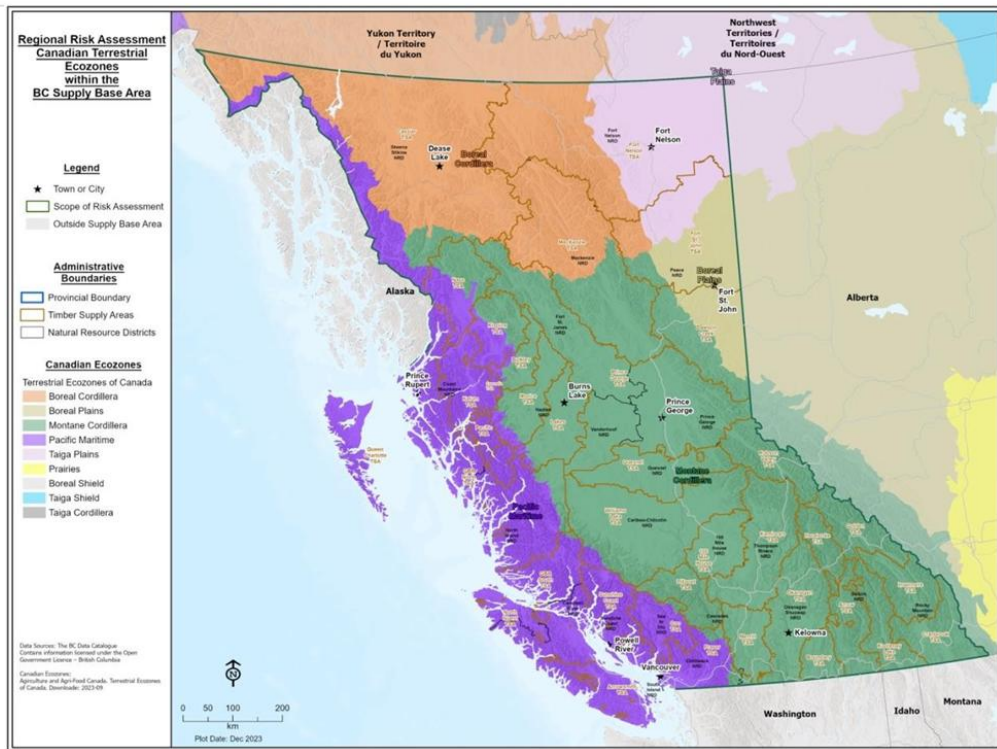
Figure 4: WWF Forest Ecoregions of British Columbia



National-Level Ecological Classification

Terrestrial ecozones developed by Environment and Climate Change Canada (ECCC) place BC in nine ecozones (Figure 5).

Figure 5: Environment and Climate Change Canada Terrestrial Ecozones of British Columbia



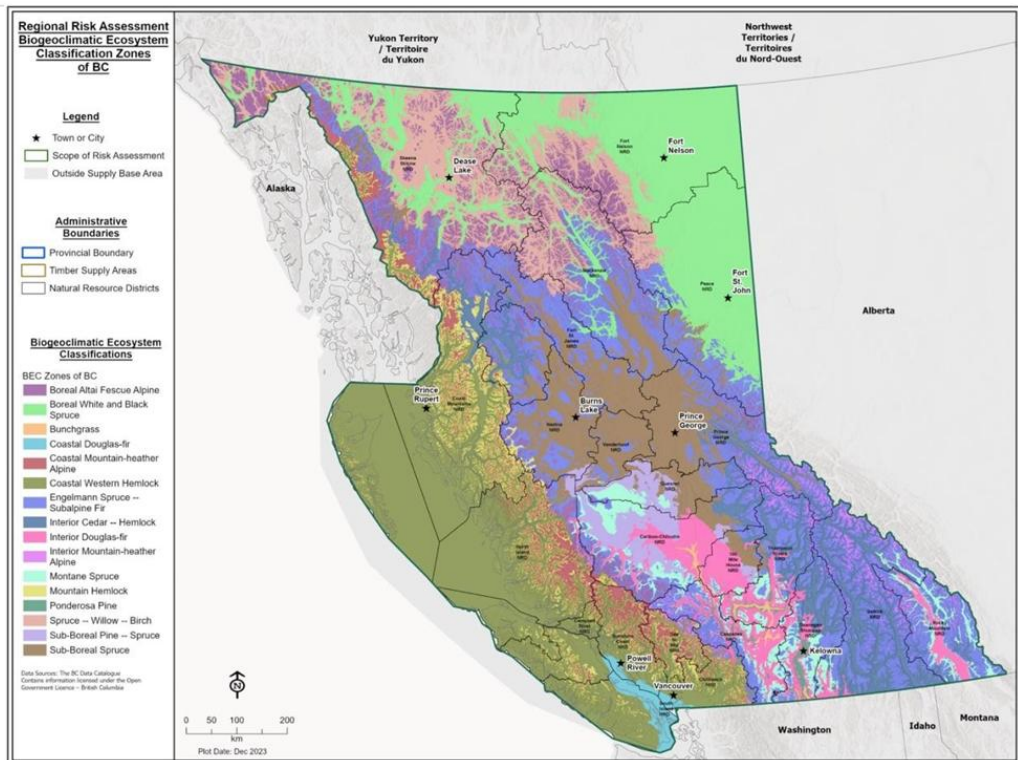
Provincial-Level Ecological Classification

The BC ecological classification system is a fine-scale Biogeoclimatic Ecological Classification for conservation and forest management planning. It is a hierarchal system that uses climax vegetation communities to infer the combined ecological effects of climate and soil. At the regional level, the province is divided into 16 Biogeoclimatic Ecological Classification Zones (Figure 6) with relatively uniform climate (i.e., similar regional or macroclimate). The distribution of tree species is a function of the climate and soils of the zones. Zones are usually named after one, two, or three dominant climax tree species. The names can also include another general distinguishing feature of the area, such as geographic location (interior, coastal), or climate (subboreal, boreal, montane). Biogeoclimatic Ecological Classification Zones are further divided into climatically distinct subzones. Subzones are named first with a descriptor of relative precipitation (moisture) and then either relative temperature or continentality.⁶ For example, subzones in the Coastal Western Hemlock zone range from very dry maritime (CWHxm) to very wet hypermaritime (CWHvh).

⁶ [About BEC and BGC Units](http://cfcg.forestry.ubc.ca), cfcg.forestry.ubc.ca, University of British Columbia, Faculty of Forestry.

There are 43 native tree species in these ecozones, some of which, particularly coastal species western red cedar (*Thuja plicata*) and Douglas-fir (*Pseudotsuga menziesii*), with lifespans of over 500 years.⁷ Many of the ecozones in the north and interior are dominated by fire-origin species; spruces (*Picea*), pines (*Pinus*), and Poplar (*Populus*).

Figure 6: BC Ecological Classification System



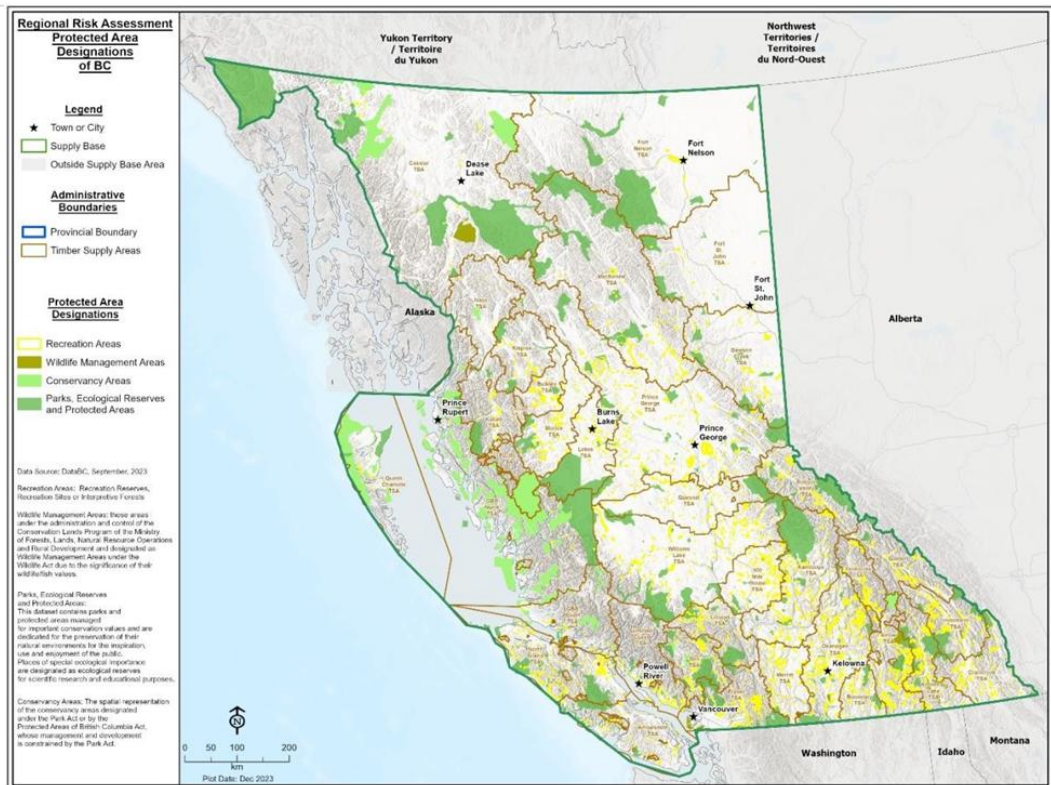
Protected Areas and Parks

As of June 2024, 14 million ha (14%) of BC is protected in parks and other types of protected areas. These protected areas include national parks, provincial parks conservancies, designations, ecological reserves, wildlife management areas, and national wildlife areas, as identified in Figure 7.⁸

⁷ Roberta Parish, [Tree Book: learning to recognize trees of British Columbia](#), 1995.

⁸ [Map of Forest Management in Canada](#), open.canada.ca, Government of Canada.

Figure 7: Protected Areas in British Columbia



MECCS is responsible for the effective protection, management, and conservation of BC’s water, land, air, and living resources. As authorised under several pieces of legislation, MECCS oversees the province’s protected areas network.

- The Parks Act provides the establishment, classification and management of parks, conservancies, and recreation areas.
- The Park, Conservancy and Recreation Area Regulation provides regulations around the requirement for permitted uses, public conduct and enforcement, and the authority of park rangers.
- The Ecological Reserve Act provides for the establishment and administration of ecological reserves.
- The Protected Areas of British Columbia Act consolidates most of the Class A parks, conservancies, and ecological reserves, and ensures the boundaries of these areas cannot be modified to remove lands except by an Act of the legislature.
- The Wildlife Act provides for the establishment and regulation of wildlife management areas.

Together, these protected area designations afford legal protection to many of BC’s significant natural, 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

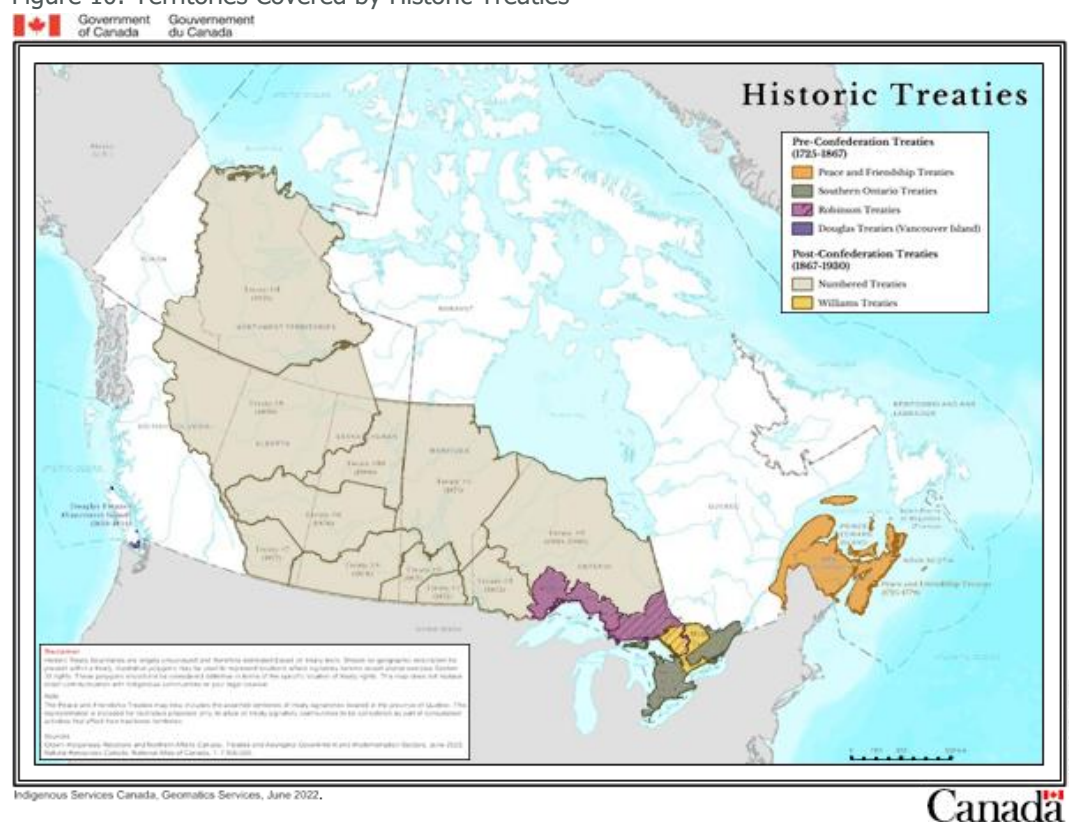
There are over 203 distinct First Nations communities in British Columbia (BC) (Figure 8).⁹ More than 30 different First Nation languages and nearly 60 dialects are spoken in the province. In the most current census (2021), Statistics Canada recorded 290,210 Indigenous Peoples in BC, making up 5.8% of the population. Of the Indigenous population in BC, 180,085 (62.1%) identified as First Nations people, 97,860 (33.7%) as Métis, and 1,725 (0.6%) as Inuit, and 10,540 (3.6%) identified under multiple Indigenous ethnicities or included responses not included elsewhere.¹⁰

The historic treaties in BC include the Douglas Treaties, signed with First Nations on Vancouver Island, and Treaty 8, which covers a portion of northeastern BC, as well as part of northwest Alberta (Figure 9). Many First Nations retain Aboriginal title to their traditional territories.

⁹ [Indigenous Peoples in British Columbia](https://www.sac-isc.gc.ca), sac-isc.gc.ca, Government of Canada, Indigenous Services Canada.

¹⁰ [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.

Figure 10: Territories Covered by Historic Treaties



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.

Three provincial-level bodies provide political leadership for First Nations in BC:

- The British Columbia Assembly of First Nations “is a Provincial Territorial Organization (PTO) representing and advocating for the 203 First Nations in British Columbia”.¹¹
- The Union of British Columbia Indian Chiefs’ “mandate is to work towards the implementation, exercise and recognition of our inherent Title, Rights and Treaty Rights and to protect of our Lands and Waters, through the exercise, and implementation of our own laws and jurisdiction”.¹²
- The First Nations Summit, is comprised “of most First Nations and Tribal Councils in BC and provides a forum for First Nations to discuss treaty negotiations and other common concerns”.¹³

¹¹ [Vision and Mission](https://www.bcafn.ca), bcafn.ca, British Columbia Assembly of First Nations.

¹² [Mandate](https://www.ubcic.bc.ca), ubcic.bc.ca, Union of British Columbia Indian Chiefs.

¹³ [Home](https://www.fns.bc.ca), fns.bc.ca, First Nations Summit.

The executive of these three organisations meets as the First Nations Leadership Council. The Métis Nation British Columbia represents many of BC's Métis people. In "November 2021, Métis Nation British Columbia and the Ministry of Indigenous Relations and Reconciliation finalized a letter of intent that renews a shared commitment to strengthen their relationship and advance reconciliation with Métis people in B.C".¹⁴ Many Métis emigrated to BC from other provinces, and there is no recognised historic Métis community in BC.¹⁵

Relevant Court Rulings

In 2008, in *Haida Nation vs. British Columbia (Ministry of Forests)*, the provincial court affirmed the legal requirement that the government consult with First Nations when a land claim is in process and laid out the framework for the duty to consult and accommodate in such circumstances. In 2014, regarding *Tsilhqot'in Nation v. British Columbia*, the Supreme Court of Canada found that the Tsilhqot'in Nation holds Aboriginal title to traditional territory that was used continuously and exclusively and experiences a sufficient level of occupation, giving the First Nation the right to exclusive use and occupation, as well as the right to enjoy economic benefits from the land.

Reconciliation Process

First Nations and the BC and Canadian governments have entered into treaties to address matters such as Indigenous rights, self-government, land and resources, fishing and forestry. Since 1990, First Nations, Canada and BC have been negotiating modern treaties and have agreed upon the framework for a modern treaty process. The British Columbia Treaty Commission was created to oversee the process. As of March 2024, there are four modern treaties in place, with eight First Nations: Tla'amin Nation, Tsawwassen First Nation, Nisga'a Nation and the Maa-nulth First Nations (a five-member First Nation). A number of modern treaties are in various stages of negotiations. In 2003, the provincial government introduced regulatory changes to the forestry sector. One of these changes was the creation of BC Timber Sales and the redistribution of 20% of the Allowable Annual Cut (AAC) from large tenures to small businesses, First Nations tenure, and new entrants. By October 2010, First Nations held 11.70 million m³/yr of AAC within competitive and direct award forest tenures. This amounted to 13.9% of the provincial AAC. First Nation Woodland Licences, created in 2010, allow First Nations to manage a suite of values, including the protection of culturally significant sites and the opportunity to market traditional botanical products. The BC government also returns a portion of the stumpage paid by the community as a component of the provincial revenue-sharing. In 2019, BC passed the Declaration on the Rights of Indigenous Peoples Act (DRIPA) which establishes the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) as the provincial framework for reconciliation. The purpose of the Act is to "recognize and protect the rights of Indigenous peoples. It will create a clear process to make sure Indigenous peoples are a part of the decisions that affect them, their communities, and their territories—and it provides a path forward for everyone."¹⁶ In 2021, BC passed the Forest Amendment Act, which provides new tools to reduce the timber harvesting rights of existing forest tenure holders, compensates existing forest tenure holders, and redistributes the timber harvesting rights to First Nations, communities, and BC Timber Sales.

The BC government shares revenue from certain carbon offset projects with First Nations. Atmospheric Benefit Sharing Agreements clarify First Nations' ownership and the right to sell tonnes of carbon in local or international carbon markets.

¹⁴ [Métis in BC](https://www2.gov.bc.ca/gov/content/indigenous/mnbc), gov.bc.ca, BC Government.

¹⁵ Mussell, Stephen, [Do Métis have Rights in British Columbia? Let our Métis People be heard in a Good Way](#), Yellowhead Institute, October 2020.

¹⁶ [British Columbia's Historic Declaration on the Rights of Indigenous Peoples Act](https://bcdripa.org), bcdripa.org, BC Legislation on the Declaration on the Rights of Indigenous Peoples.

2.1.4 Land Use

Land use data has been sourced from Natural Resources Canada and the Canada Centre for Remote Sensing using a national dataset: 2020 Land Cover of Canada.¹⁷ Figure 10 identifies various land cover types and uses such as forested, cropland/agriculture use and built-up areas and provides the proportion of land use types. Figure 11 shows the distribution of land use within BC.

Figure 10: Proportion of Land Use Types of BC

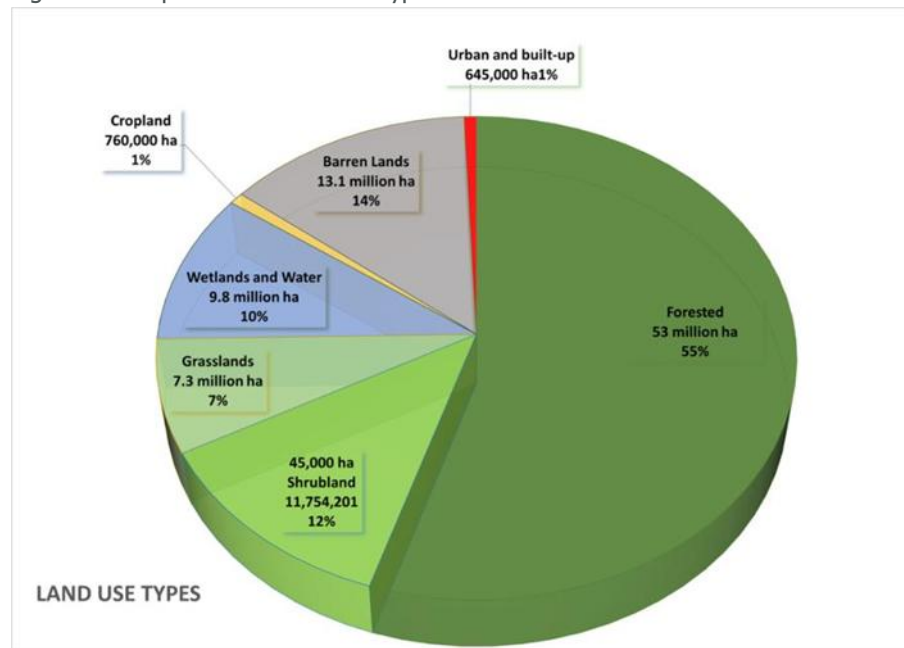
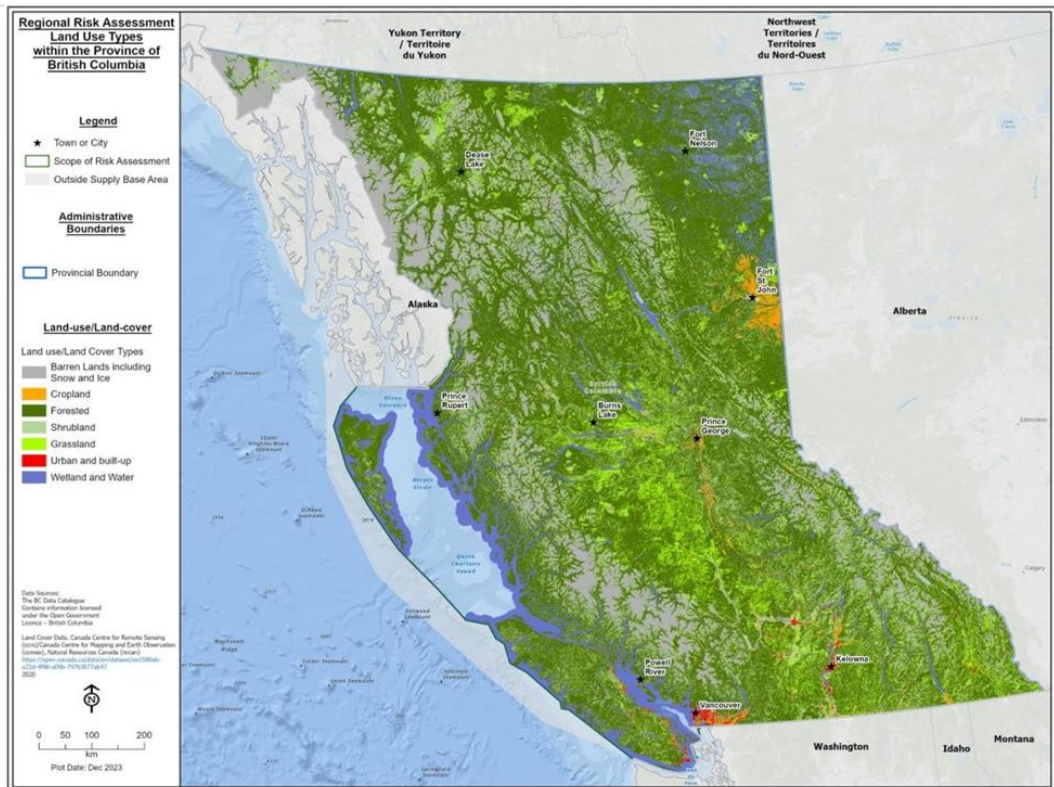


Figure 11: Land-use/Land-cover Types of BC



¹⁷ [2020 Land Cover of Canada](https://open.canada.ca/), open.canada.ca, Government of Canada.

Land Use Planning

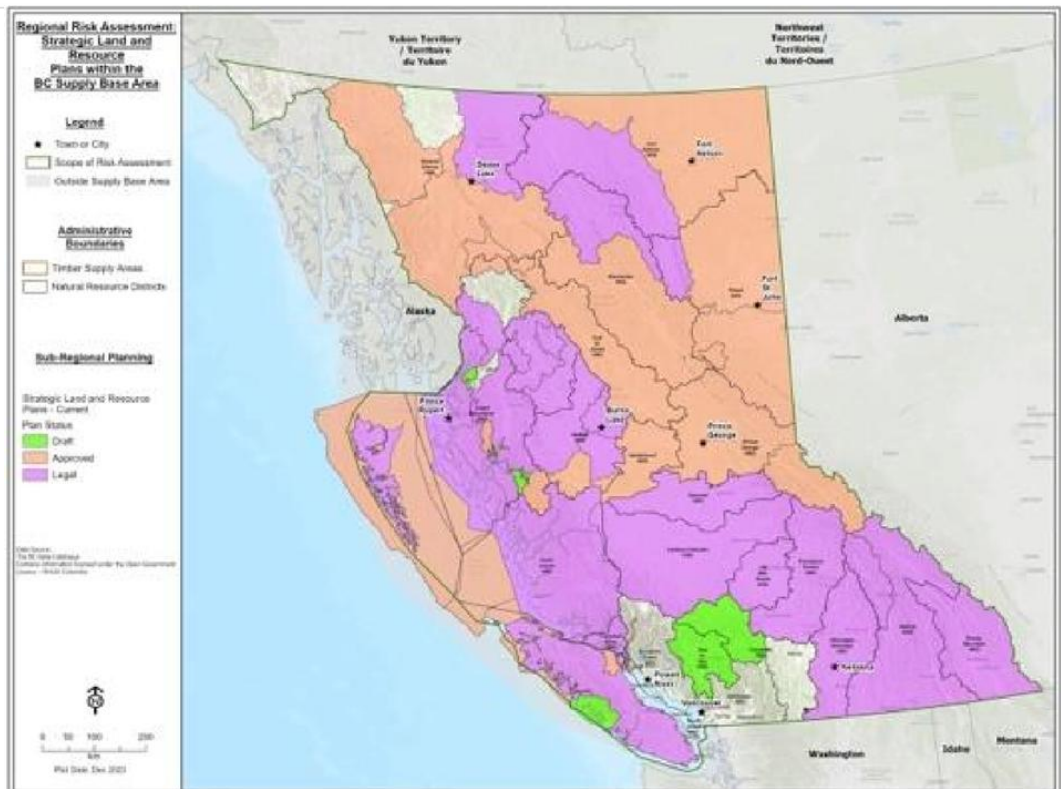
Since the 1990s, the BC government has worked with First Nations, government agencies, and stakeholders on strategic land use planning. Existing land use plans cover over 90% of BC public land. Strategic land use planning addresses complex, strategic land use issues, sets land use direction under various legislative frameworks, advances reconciliation and partnerships with First Nations, and achieves ecosystem conservation and economic development objectives. The process is integrated, regional, and consensus-based, which requires public and First Nations participation. Land use planning is modified over time to address changing needs.¹⁸

Historical plan types include sustainable resource management plans, land and resource management plans, regional land use partnerships, and coastal plans (Figure 12: Approved Sub-regional & Landscape Scale Strategic Land Use Plans).¹⁹

¹⁸ [Modernized Land Use Planning in British Columbia](https://www2.gov.bc.ca/), gov.bc.ca, BC Government website.

¹⁹ [Strategic Land and Resource Plans – Current](https://catalogue.data.gov.bc.ca/), catalogue.data.gov.bc.ca, BC Government.

Figure 12: Approved Sub-regional & Landscape Scale Strategic Land Use Plans

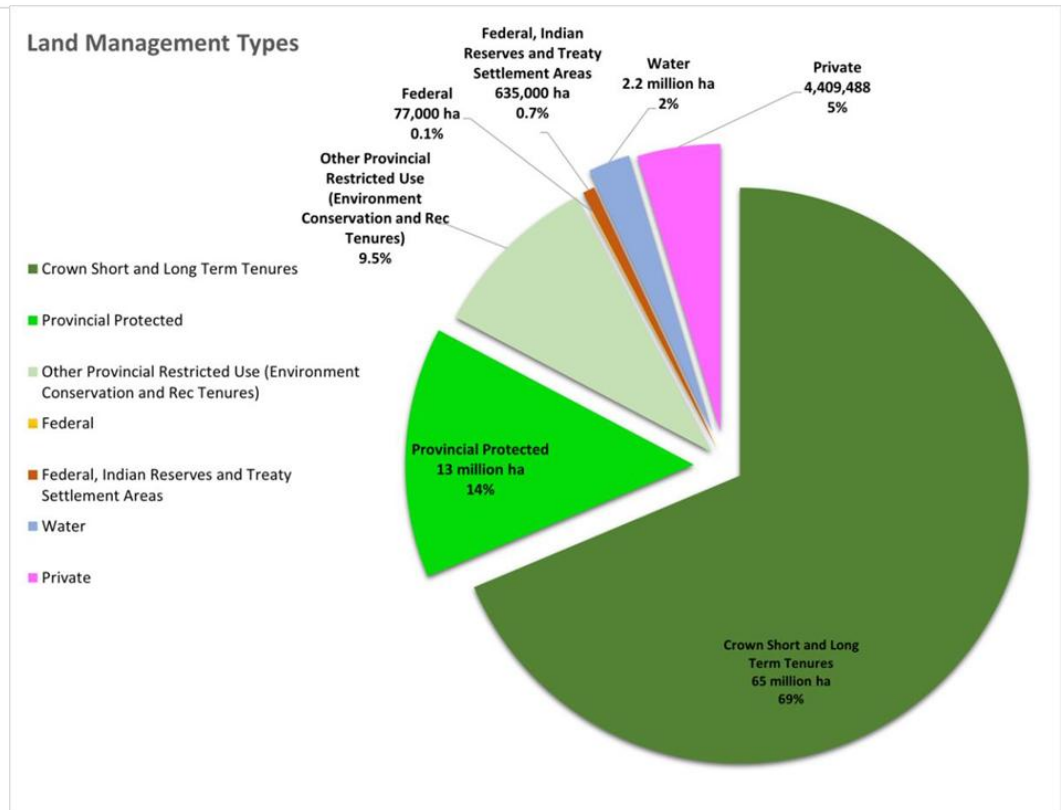


Since 2018, the BC government has been moving towards a more integrated approach to planning. Various planning programs developed over the last 30 years, including land use planning, forest landscape planning, water and watershed planning, species at risk and habitat planning, are being integrated into a single process. This happens through discussions with partner First Nations and input from stakeholders and communities to develop a coordinated process for achieving objectives at multiple planning scales. A new land use plan or a modification of an existing plan results from a land use planning process. New land use plans require agreement from the BC government and partner First Nation and are developed through collaboration and engagement with local governments, stakeholders, and communities. Existing land use plans require updates and modifications to reflect the current state of ecosystems and socio- economic landscape, and to include First Nations perspectives. Once approved, the management direction in a plan becomes policy and may be further implemented with the appropriate legislation or regulation.

2.1.5 Land Ownership

There are four principal types of land ownership in BC: federal Crown land (which includes reserves), provincial Crown land, First Nation privately owned land and land claim settlements, and private land. Figure 13 spatially identifies the primary ownership of all lands (including non-forest land) across the province.^{20, 21} Land ownership patterns are generally very stable, with minor changes occurring due to the regular update of historic land title documents. Specific information on these ownership types as related to the forested land base is discussed in Section 4.6 Forest Sector by Land Ownership.

Figure 13: Distribution of Land Management Types



²⁰ [Generalized Forest Cover Ownership](https://catalogue.data.gov.bc.ca), catalogue.data.gov.bc.ca, BC Government.

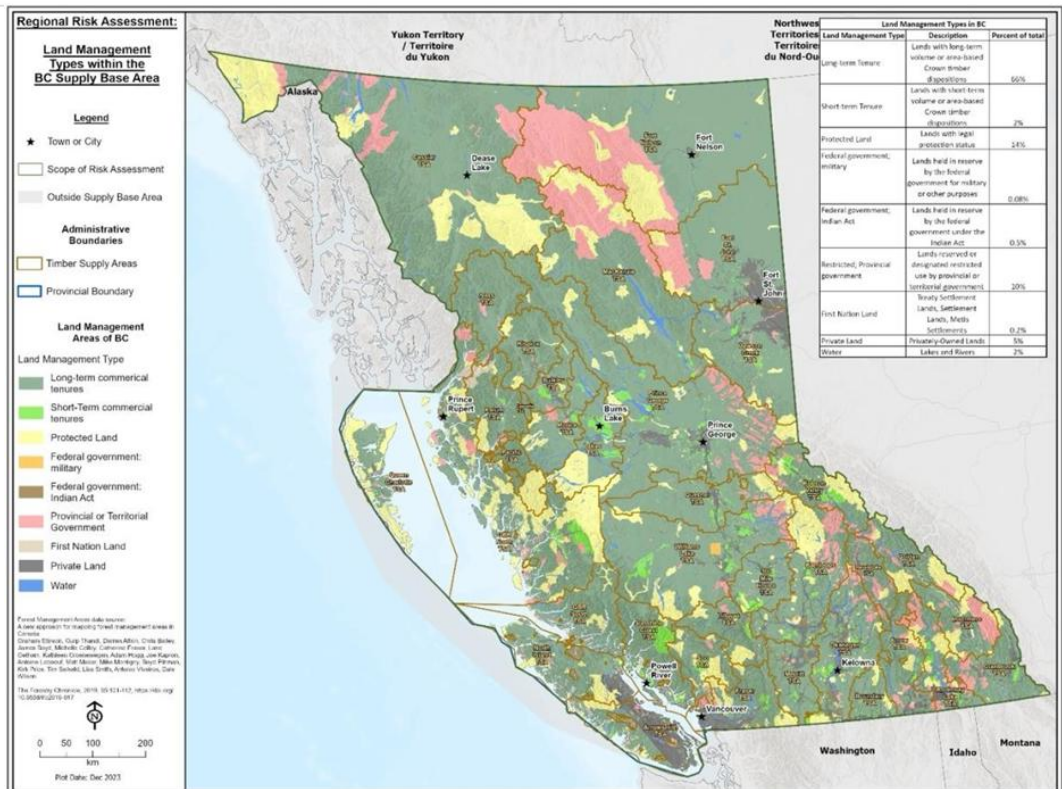
²¹ [Map of Forest Management in Canada](https://open.canada.ca), open.canada.ca, Government of Canada.

2.1.6 Forest Sector by Land Ownership

Overview

Forests cover approximately 60 million ha (63%) of British Columbia's land base (95 million ha).²² Crown land forests are roughly 57 million ha. Privately owned forest land is roughly three million ha, and approximately two million ha is suitable for timber harvesting.²³ Eighty-five per cent of timber harvesting occurs on Crown land. Figure 14 depicts the land management types and distinguishes between ownership and tenures where forests are being managed, by whom, and for what objectives.

Figure 14: Land Management Types in British Columbia



Regulatory Framework

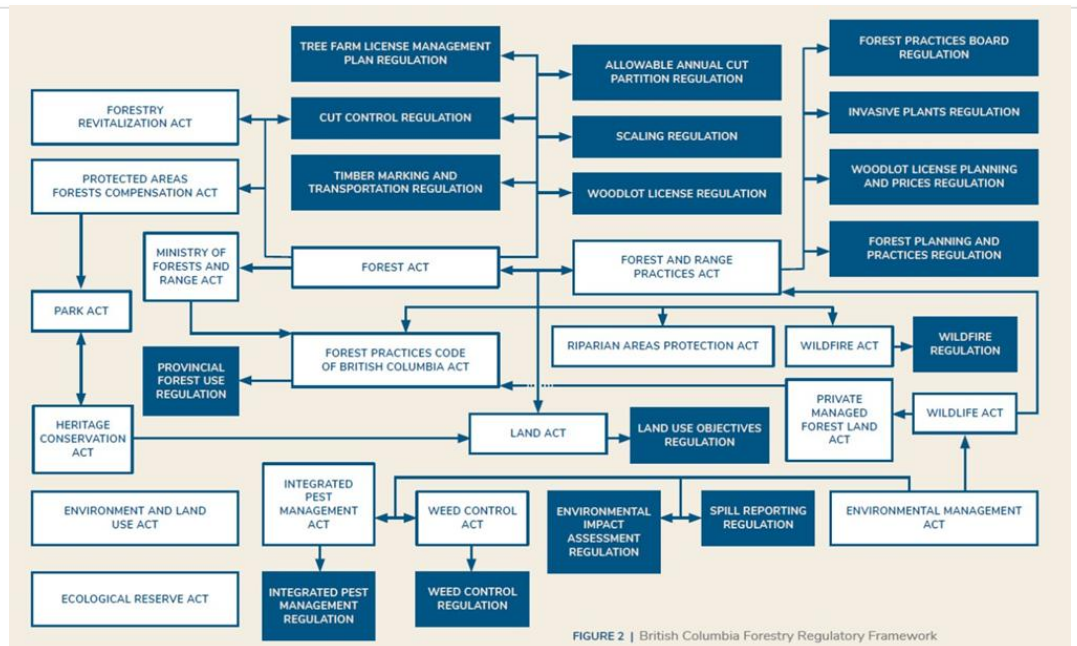
The forests in different ownership types are managed under different regulatory frameworks. The following sections describe the legislative framework, forest management implementation, and conformance monitoring for each of the ownership types: Crown land, private managed forest land, and other private land (unmanaged).

²² BC Government, [Timber Supply Review Backgrounder](#), April 2021.

²³ BC Ministry of Forests, [The State of the British Columbia's Forest. Third Edition](#), 2010.

Federal legislation includes the Fisheries Act, Migratory Birds Convention Act, and Species at Risk Act and applies to all three ownership types. See Annex 3: List of Publications Used for a comprehensive listing of all federal legislation. BC has a comprehensive regulatory framework (Figure 15).²⁴ The Forest Act (1996) allows the BC government to designate lands as a timber supply area and determines harvest levels known as Allowable Annual Cut (AAC), reviewed every ten years. The Acts most relevant to forestry include the Professional Governance Act, Forest and Range Practices Act, and Forest Planning and Practices Regulation, Wildfire Act, Environmental Management Act, Ecological Reserve Act, Wildlife Act, and Riparian Areas Protection Act. As outlined in Figure 15, there are many other Acts and Regulations which govern forestry in BC. All timber harvested and transported for processing must have a timber mark, which allows for the legal tracking of timber movement. Timber marks are a requirement for transport from Crown land, private managed forest land, and other private land.

Figure 15: British Columbia Forestry Regulatory Framework

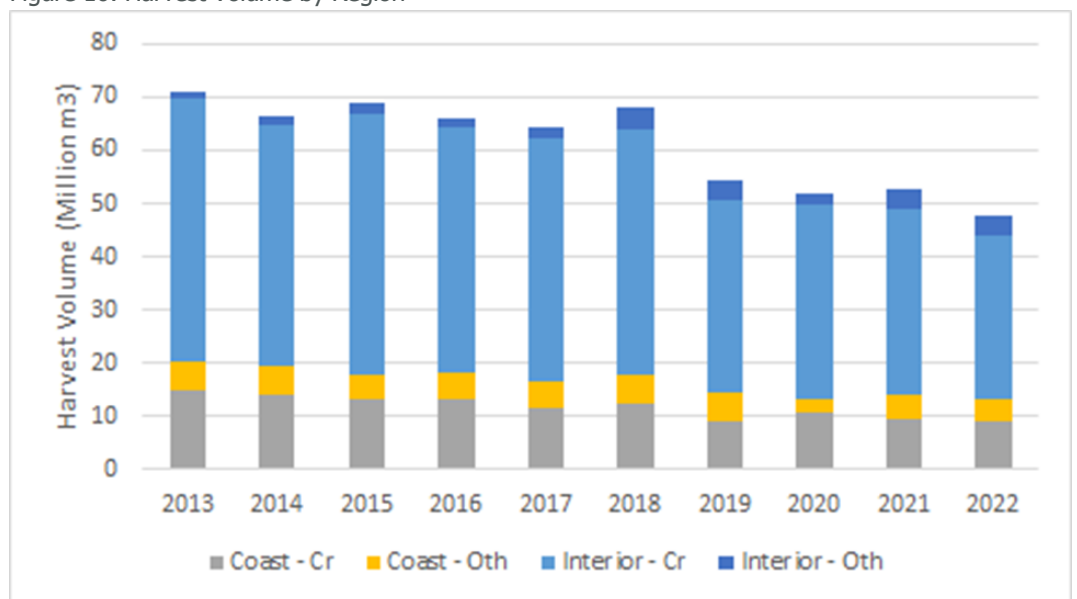


²⁴ NCASI18. Canadian Forestry Regulations and Standards, 2021.

Harvest Levels

The BC Ministry of Forests 2022 Economic State of British Columbia's Forest Sector report provides harvest data for BC from 2013 to 2022.²⁵ In 2022, BC's reported total timber harvest volume was 47.7 million m³. The Crown harvest was 40.0 million m³ in 2022, representing 64% of the Crown land AAC of 62.3 million m³/year.²⁶ Between 2013 and 2022, the Interior accounted for between 70% and 74% of the provincial harvest. Figure 16 shows the amount of harvest volume from Crown land (abbreviated Cr) and private and federal land (Oth) from the Coast and Interior regions of BC.

Figure 16: Harvest Volume by Region



The principal timber losses over the past two decades are due to the mountain pine beetle outbreak, which killed most of the lodgepole pine in the BC Interior between 2000 and 2010, and large wildfires

in 2017, 2018, 2021 and 2023. In 2019, BC's Chief Forester began to actively lower the AAC in the Interior in response to the large losses of merchantable lodgepole pine.

²⁵ BC Ministry of Forests, Economics and Trade Branch, [2022 Economic State of British Columbia's Forest Sector](#), 2022.

²⁶ BC Ministry of Forests data, 2022.

Crown Land

General

Approximately 57 million ha of productive forest land is owned by the province and is classified as public forests on Crown land.

Governance & Legislation

Crown land forests are managed by the BC Ministry of Forests (FOR). Through the Forest Act and its associated regulations, FOR 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 (stumpage) are completely and accurately invoiced. This data is tracked through the provincial government's Harvest Billing System. The BC Ministry of Environment and Climate Change Strategy (MECCS) is responsible for the oversight of the Water Sustainability Act, Integrated Pest Management Act, and the Environmental Management Act. See Annex 3: List of Publications Used for a comprehensive list of all applicable legislation.

Forest Management Tenure System

FOR, under the Forest Act, is the authority that allocates forest tenure, issues agreements, licences and permits and oversees forest management of Crown land.²⁷ Tenures are used by the government to allocate specific rights for using Crown forest and resources to others. Under a tenure agreement, private forest companies, Indigenous communities, and individuals are granted the right to harvest Crown timber as a specified cutting area, a maximum volume within an area, or an AAC for a specified period. In exchange, each agreement-holder or licensee has specified obligations to meet that are outlined in the agreement or licence. There are twelve tenure types that reflect forest uses on Crown land.²⁸ Tenures are grouped into two types: area-based and volume-based. Tree farm licences (TFLs) (area-based) and replaceable forest licences (volume-based) are the two long-term licences that are generally issued to forestry companies.²⁹ There is a wide range of other licence types (both area-based and volume-based) that are issued for other types of licensees, conditions and durations.

Annual Allowable Cut & Harvest Levels

Timber supply is the amount of timber that is forecast to be available for harvesting over a specified time and under a particular management regime for a management unit. Area-based tenures include 36 TFLs, woodlot licences, community forest agreements and First Nations woodland licences, as identified in Table 4: Crown Land Tenures and 2024 Allowable Annual Cut. Volume-based tenures are within 37 timber supply areas (TSAs). The BC Chief Forester sets the AAC for each TSA and TFL through a timber supply review process typically every ten years. A key part of the timber supply review process is determining the timber harvesting land base, which 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 timber harvesting land base is the land base upon which the AAC is based.

²⁷ [Forest Tenure Administration](#), gov.bc.ca, BC Ministry of Forests, June 2024.

²⁸ [Timber Harvesting Rights](#), gov.bc.ca, BC Ministry of Forests, June 2024.

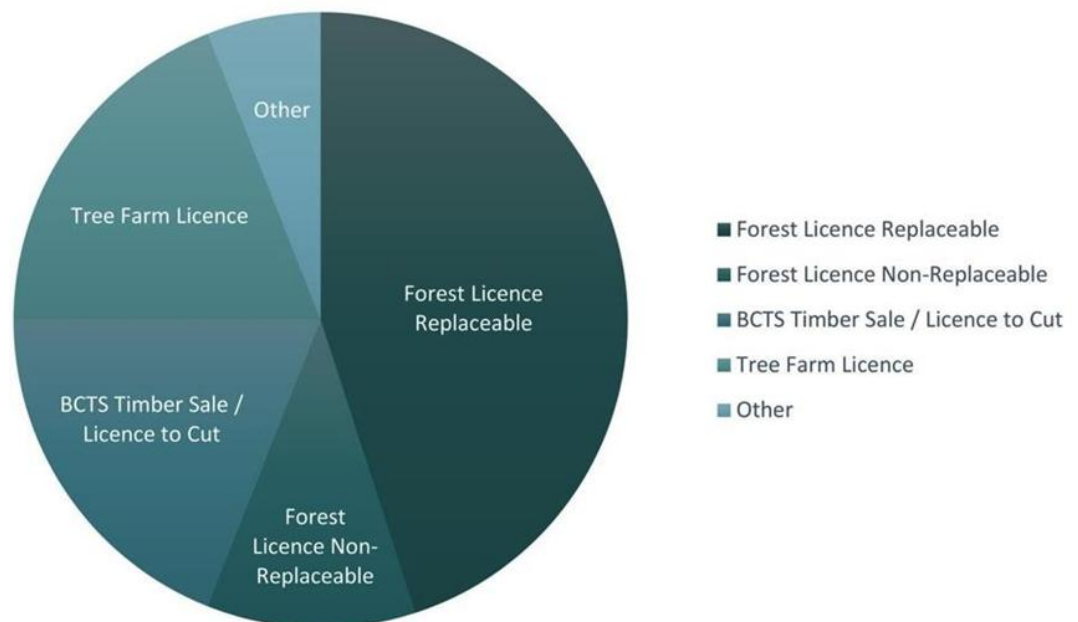
²⁹ [Tree Farm Licences](#), gov.bc.ca, BC Ministry of Forests, May 2024.

Once the AAC level is set within TSAs, FOR allocates the AAC to the general types of volume-based forest licences and if necessary, creates new harvesting opportunities. AAC determinations for area-based tenures, such as TFLs, are separately determined and specific to the area-based tenure type. The majority of Crown land AAC is from volume-based tenures within TSAs (Figure 17).³⁰

Table 4: Crown Land Tenures and 2024 Allowable Annual Cut

Crown Tenures	Total AAC (m ³)
Area Based Tenures	
Tree Farm Licences ³¹	11,300,690
Community Forest ³²	2,179,383
First Nations Woodland Licences ³²	1,484,724
Woodlot Licences ³²	1,379,376
Volume Based Tenures	
Timber Supply Areas ³³	45,476,247
Provincial Crown Land AAC	61,820,420

Figure 17: Apportionment of Provincial Annual Allowable Cut



³⁰ BC Ministry of Forests, [Timber Tenures in British Columbia: Managing Public Forests in the Public Interest](#). 2023.

³¹ [Allowable Annual Cut - Tree Farm Licences](#), gov.bc.ca, BC Ministry of Forests, June 2024.

³² [Apportionment & Commitment Reports - Allowable Annual Cut \(FNWL CFA WL AAC Report\)](#), gov.bc.ca, BC Ministry of Forests, March 2024.

³³ [Allowable Annual Cut - Timber Supply Areas](#), Gov.bc.ca, BC Ministry of Forests, June 2024.

Timber volumes harvested under each Crown tenure are tracked and reported annually. Approximately 200,000 hectares (<1%) of the available Crown land forest area is harvested annually. In five-year increments, FOR will compare the timber volume harvested over the period with the agreement's harvest rights and issue a cut control statement. Monetary penalties are charged for exceeding cut control limits. Any unharvested volume at the end of a cut control period becomes unavailable to the agreement holder.

Forest Management Planning & Practices Implementation

The Forests and Range Practices Act sets out strategic and operational planning and practices requirements for all stages of forestry planning, road building, logging, and reforestation on Crown land. The Forest Planning and Practices Regulation identifies the objectives set by the government for key resource values, specifies the content requirements of Forest Stewardship Plans, and stipulates the practice requirements that regulate forestry activities. A Government Actions Regulation directs how FOR establishes land designations, resource features, or stewardship measures for forest and range values. Forest management planning is implemented through a forest stewardship plan, a map-based, landscape-level plan of potential forest development activities intended to take place in the plan area. The Forests and Range Practices Act (enacted in 2004) adopts a 'results-based' approach, where the Crown licensee is responsible for achieving results of management actions specified in Forest Stewardship Plans. Forest agreement holders must prepare and have approval by FOR a Forest Stewardship Plan before harvesting or road-building activities can begin. Under the Forest Planning and Practices Regulation, Forest Stewardship Plans must consist of results and strategies that an agreement holder must include for the 11 provincial resource values: biodiversity, cultural heritage, fish and riparian, forage and associated plant communities, recreation, resource features, soils, timber, water quality, wildlife, and visual quality. Forest Stewardship Plans have a term of five years. During the site planning stage, a forest professional may deem it necessary to complete site-level assessments to exercise due diligence regarding complying with forestry legislation. Assessments may include pre-harvest site data collection, including data on soil characteristics, terrain stability assessments, and determination of soil hazard ratings and seasonal restrictions regarding the time of harvest. Under the Forest Act, cutting permits and road tenures are issued to the agreement holder. A cutting permit allows harvesting in a specific area on Crown land. Road tenures (road permits and road use permits) provide the holder of an agreement with authority to use and maintain a road on Crown land for industrial purposes. A road permit may give the agreement holder with the cutting authority to cut and remove Crown timber and construct, use, and maintain a road. A road use permit permits the use and maintenance of a forest service road. All industrial users on a forest service road must obtain a road use permit.

Monitoring/Compliance & Enforcement of Forest Practices

Monitoring is the act of assessing activities and outcomes. Monitoring forest practices focuses on compliance, effectiveness, or how the realised outcomes compare with the anticipated outcomes. Crown licensees undertake inspections of operations to ensure compliance with requirements and regularly assess the effectiveness of harvesting, road construction, and silviculture operations. Three principal government programs provide additional oversight, the Compliance and Enforcement Branch (CEB), Forest Practices Board (FPB), and Forest and Range Evaluation Program (FREP).

Compliance and Enforcement Branch

FOR CEB assesses compliance with a wide range of regulations affecting the use of Crown land, including those pertaining to timber harvesting. The CEB conducts compliance inspections through routine inspections in response to complaints or incidents, and scheduled inspections in response to FOR's identified priorities. The CEB investigates potential non-compliance with laws and regulations, including laws specific to forest management planning and practices. The CEB can take compliance or enforcement actions through remediation, compliance notices, warning or violation tickets, administrative or monetary penalties, and prosecution. Suspension of a tenure or licence, or cancellation of a tenure can also be enforced by the CEB.

Forest Practices Board

The FPB, an arms-length board appointed by the BC government, is a watchdog organisation for BC's sound forest and range practices. The FPB operates independently from government agencies including FOR. Its mandate includes auditing forest and range practices on public lands to determine if activities are consistent with legislation and operational plans and evaluating the effectiveness of forest management, planning, and associated forestry regulations. FPB also investigates public complaints about compliance with FRPA and other complaints related to forestry practices on Crown land. The FPB does not have the authority to direct companies, individuals, or government agencies to take specific actions, though forestry companies often follow FPB recommendations.

Forest & Range Evaluation Program

Under FRPA's results-based model, FREP evaluates the effectiveness of forest and range practices in achieving the forest management objectives set out in FRPA and the overall sustainability of resource management. FREP is a third-party verified program by the National Quality Institute to ensure that the expected results of forest management are occurring. FREP evaluates at the site level whether forest practices result in sustainable conditions. FREP uses impact ratings as a measure of sustainability; if the practices are deemed sustainable, FREP assumes that the value is being conserved as intended by FRPA.

FREP objectives include:

- Assessment of the impacts of forest and range development on the 11 FRPA resource values to determine if on-the-ground results are sustainable;
- Identification of resource value status, trends, and causal factors; and
- Identification of opportunities for continued improvement of practices, policies, and legislation.

Enforcement of applicable legislation on Crown land is the responsibility of the designated authorities, including the BC Ministry of Forests and Ministry of Environment & Climate Change Strategy, and the federal Environment and Climate Change Canada and Fisheries and Oceans Canada. The level of enforcement varies depending on each local government's capacity, resources, and priority. In most cases, compliance and enforcement are initiated by public complaints.

Government Reviews & Initiatives

In response to feedback received over the last decade from First Nations, the FPB, the forest industry, the Union of British Columbia Municipalities and other resource groups, the BC government is changing the forestry legislative framework. FOR is engaged in a multi-year legislative and regulatory process to strengthen public confidence in managing BC's forest resources. BC is implementing changes to FRPA, which include removing limitations set by the government, new protections for ecological communities, implementation of a forest operations map and changes to Forest Stewardship Plans, and practice requirements for established recreation sites and trails. In the summer of 2021, FOR released Modernizing Forest Policy in British Columbia: Setting the Intention and Leading the Forest Sector Transition. The province aims to change policy with the Old Growth Strategic Review, Interior Forest Sector Renewal and Coast Forest Sector Revitalization. Based on the government's forest inventory definitions, about 23%, or 13.2 million hectares is classified as "old growth" (Gorley and Merkel 2020). In 2019, the BC Government appointed an independent, two-person panel as part of an Old Growth Strategic Review. Since receiving the independent panel's report in 2020, the BC government has taken action on recommendations. The immediate priorities outlined in the report included engaging First Nations leaders and organisations to review the report and work with the province on any policy or strategy development and

implementation, identifying and temporarily deferring more old growth in collaboration with First Nations, addressing information gaps by updating inventory and improving public access to information, and involving other stakeholders (industry, workers, environmental groups, community-based organisations and local governments) in discussions about the future of old growth forests. At the scale of the province about 75% of the old growth forest are protected or in the Non-Timber Harvesting Landbase (excluding private land) according to the report of Forsite. The Coast Forest Sector Revitalization Initiative aims to create and support jobs on BC’s coast, increase the processing of BC logs within the province and reduce residual waste fibre left in harvest blocks by redirecting it to other mills. There are five main goals in the Coast Forest Sector Revitalization Initiative: Rebuilding solid wood and secondary industries to ensure BC logs are processed in the province, improving harvest performance for better utilisation, maintaining a credible auction system, fostering stronger business-to-business relationships between BC Timber Sales, major licensees and Indigenous people, and restoring public confidence through amendments to FRPA and auditing the private managed forest land regime. In spring 2019, the BC government announced a renewal of the province’s interior forest sector. The strategy is meant to create a competitive, sustainable future for forest companies, workers, and communities. Four objectives were set to improve the long-term success of the interior forest sector: a globally competitive forest sector, resilient communities and workforce, reconciliation with Indigenous communities, and sustainable forest management.

Private Forest Land

Provincially, there is 4.5 million ha of privately owned land used for compact and dispersed residential, agricultural, rangeland, private forestry, commercial, industrial, utility, transportation and institutional purposes. Three million ha of privately owned land is forested; of this, approximately two million ha may be suitable for timber harvesting (Table 5). Private lands are owned under fee simple title and include land owned by private individuals and corporations, owned by independent provincial Crown corporations and agencies, and owned by federal and local governments. BC may have granted or sold these lands to the owners.

Private land forests have been divided into two groups—those registered in the Private Managed Forest Land Program and other private land (unmanaged).

Table 5: Private Land Area

	Total Ha
Provincial Total ³⁴	4,500,000
Forested ³⁵	3,000,000
Suitable for Harvest ³⁶	2,000,000
Private Managed Forest Land ³⁷	806,000
Other Private Land (estimate)	1,194,000

Private Managed Forest Land

Private landowners may choose to register their forested land in the Private Managed Forest Land Program, which was established in 2003 under the Private Managed Forest Land Act (PMFLA). To be eligible to be classified as private managed forest land, land must be a minimum of 25 ha in size and be suitable for growing trees. Private managed forest land is a BC Assessment land classification. Under the Private Managed Forest Land Program, landowners commit to managing property for long-term forest production, including meeting legislated objectives for key public environmental values. In exchange, landowners receive favourable property tax treatment.

There are 288 private managed forests in BC, amounting to 805,869 ha. The private managed forest land properties are mainly located on Vancouver Island, the southern mainland coast, in the Kootenays, and the Okanagan-Shuswap.³⁸ The Private Forest Landowners Association (PFLA) represents managed forest owners throughout BC, but does not administer legislation or enforce compliance. PFLA provide advocacy, outreach, education, training opportunities, and communication updates on key public environmental values on private forest lands.

Governance and Legislation

The Private Managed Forest Land Act and its regulations authorise the Private Managed Forest Land Program, establish the oversight of the Managed Forest Council (MFC), and regulate forest management for private managed forest land. Legislation is primarily a results-based regulatory model. The PMFLA mandates the protection of five key environmental values set for landowners: soil conservation, water quality (protect human drinking water), fish habitat, critical wildlife habitat and reforestation. This allows landowners to develop and use management strategies most appropriate to the scale and geographic location of operations. The MFC is an independent tribunal established to administer the Private Managed Forest Land Program, including setting and monitoring forest practices standards, performing audits, publishing annual reports, and enforcing standards. The MFC has statutory authority to establish regulations regarding forest management on private managed forest land.

³⁴ [Private Managed Forest Land](#), gov.bc.ca, BC Ministry of Forests, June 2024.

³⁵ BC Government, [Timber Supply Review Backgrounder](#), April 2021.

³⁶ BC Ministry of Forests, [The State of the British Columbia's Forest. Third Edition](#), 2010.

³⁷ Managed Forest Council, [Managed Forest Council Annual Report 2022/2023](#), 2023.

³⁸ Ibid.

In addition to the PMFLA, private landowners on managed forests are modestly constrained on how the forested land is managed via limited federal and provincial legislation. See Annex 3: List of Publications Used for a comprehensive list of applicable requirements.

Federal

Federal legislation that apply to private managed forest land 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

Key provincial regulations that apply to private managed forest land include the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Assessment Act, Wildlife Act, Wildfire Act, and Heritage Conservation Act. FOR regulates the transporting of timber harvested from private land through the Forest Act and its associated Regulations. As of September 2022, new or amended management commitments must be signed by a forest professional before submission to MFC.³⁹

Local Government

Private managed forest landowners receive a bylaw exemption in exchange for a commitment to manage lands for long-term forest production and to use sustainable management practices that protect key public environmental values, as regulated by the PMFLA and PMFLA Regulation. Local governments retain the power to adopt bylaws that require information from private managed forest landowners as long as the bylaw does not restrict forest management activity.

Allowable Annual Cut & Harvest Levels

The MFC does not define AAC for private managed forest land. A private managed forest landowner must submit an annual declaration of operations to the MFC for the previous year, including harvesting of any volume of wood that is transported off the managed forest property, a harvest of more than 20

m³ during the year (regardless of whether it leaves the property), the harvest of any volume that results in an opening equal to or greater than one ha, or areas of destroyed timber equal to or greater than one ha. Table 6 provides private managed forest land harvest levels reported in the MFC Annual Reports.⁴⁰ Based on 2022/23 data, approximately 92% of private managed forest land harvest was from the coast, vs 8% in the interior.

Table 6: Private Managed Forest Land Harvest (2018 to 2022)

Harvest Year	Total AAC (million m ³)
2018	5.2
2019	5.0
2020	2.3
2021	4.5
2022	4.0

³⁹ Managed Forest Council, [Management Commitments and Forest Professionals](#), 2022.

⁴⁰ [Annual Reports](#), mfcouncil.ca, Managed Forest Council.

Forest Management Planning & Practices Implementation

The goal of the Private Managed Forest Land Program is to encourage owners to manage forests so the forests continue to provide ecological, social, and economic benefits. As required under the PMFLA, private managed forest land is managed for five key environmental values: soil conservation, water quality (protect human drinking water), fish habitat, critical wildlife habitat and reforestation. While private managed forest landowners are not required to prepare a forest management plan, a management commitment must be submitted to the MFC. New or amended private managed forest land management commitments must be prepared by a Registered Professional. Management commitment signed-off requirement sections include long-term forest management objectives and strategies to achieve those objectives, soil quality assessments, forest cover information, commercial species, and restrictions on forest activities. Owners of private managed forest land must submit a declaration of operations conducted in the previous year to the MFC annually, which includes harvesting, road construction, deactivation, and reforestation (restocking or successfully regenerating).

The MFC provides best management practice guidance to members through the Field Practices Guide, field practice audits and inspections, periodic guideline updates, and review of management commitment amendments.

Monitoring / Compliance & Enforcement of Forest Practices

The MFC is responsible for monitoring forest practices to measure the effectiveness of harvesting, road building and silviculture operations on private managed forest land in the province. The MFC has a formal inquiry process, as well as a Compliance Inspections and Investigations Procedure Manual and Compliance Determinations Procedural Manual.

Private managed forest landowners are subject to investigation by the FPB.

The MFC publishes annual reports and conducts regular audits and assessments to ensure that the requirements of the applicable Acts and the Private Managed Forest Land Program are being followed. Any landowners who are suspected of, or have had previous, non-compliance may be inspected more frequently. Inspections and audits are conducted by qualified professionals. The MFC website reported 623 inspections have been completed since 2007, and the compliance rate has been 99%. MFC can and has issued fines when violations are determined. All MFC bylaws, policies, procedures, annual reports, and audits are publicly available. Enforcement of applicable legislation on private managed forest land is the responsibility of the designated authorities, including the BC Ministry of Forests and

Ministry of Environment and Climate Change Strategy, and the federal Environment and Climate Change Canada and Fisheries and Oceans Canada. The level of enforcement varies depending on the capacity, resources, and priority of each local government. In most cases, compliance and enforcement is initiated by public complaints.

Government Reviews & Initiatives

FOR is currently reviewing the performance of the Private Managed Forest Land Program and framework. The review is one of several policy reforms announced in the Coast Forest Sector Revitalization Initiative. As part of the review, FOR sought public feedback on where the program is most effective, and if improvements are required. A report has been produced by FOR on the results of the public engagement.⁴¹ Consultation with communities, stakeholders, and regulators will continue until the completion of the review. Information will be used by FOR to determine program performance, with recommendations prepared for the BC government.

Other Private Land (unmanaged)

Other private land may be treed lands but is not registered in the Private Managed Forest Land Program. As estimated above and shown in Table 5 there are 1.2 million ha of harvestable forest on other private land.

Legislative Framework

Management/activities related to harvesting trees on other private lands are modestly constrained via 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 that applies to other private land 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

Key provincial regulations that apply to other private land include the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Assessment Act, Wildlife Act, Wildfire Act, and Heritage Conservation Act. FOR regulates the transporting and scaling of all timber harvested from other private land through the Forest Act and its associated regulations. A private timber mark is required to transport logs from privately owned land in BC.

Local Government

The local government system in BC has 162 municipalities and 27 regional districts. Regional districts in BC have populations ranging from under 4,000 to over two million and sizes ranging from 2,000 to 119,337 km². In most cases (except Metro Vancouver), regional districts cover rural areas. The Local Government Act provides the authority for local governments to develop bylaws unique to the local government and provide the framework for other private land. Regional districts and municipalities can adopt bylaws that place regulations on forest management activities on other private land within jurisdictional boundaries, including aligning bylaws with requirements equivalent to Crown forest land regulations. Local government bylaws vary across the province and within regions. Rural and remote areas have fewer bylaws and less enforcement capacity. Differences in implementation, compliance verification, priority, and enforcement capacity within local governments vary greatly across the province. There is no uniform set of bylaws adopted by local governments regarding forest management practices, making provincial verification of monitoring and enforcement difficult.

Local governments can implement development permit areas, which is a tool that provides a secondary level of oversight within a bylaw. Each local government takes an individual approach to how development permits are drafted and implemented. There is no uniform standard province-wide. Local governments may have bylaws regulating tree cutting and/or may require that development permits be obtained before tree removal in riparian areas. However, requirements vary by jurisdiction.

Development permit area policies and requirements are generally specified in official community plans that have been endorsed by the elected council or board.

Annual Allowable Cut & Harvest Levels

There is no AAC for other private land in BC, as there is no legal mechanism to regulate the level of harvesting. Harvest levels on other private land can be accessed through the Harvest Billing System due to the requirement for a timber mark.

Forest Management Planning & Practices Implementation

There is no forest management planning framework or best management practices on other private land in BC.

Monitoring/Compliance & Enforcement of Forest Practices

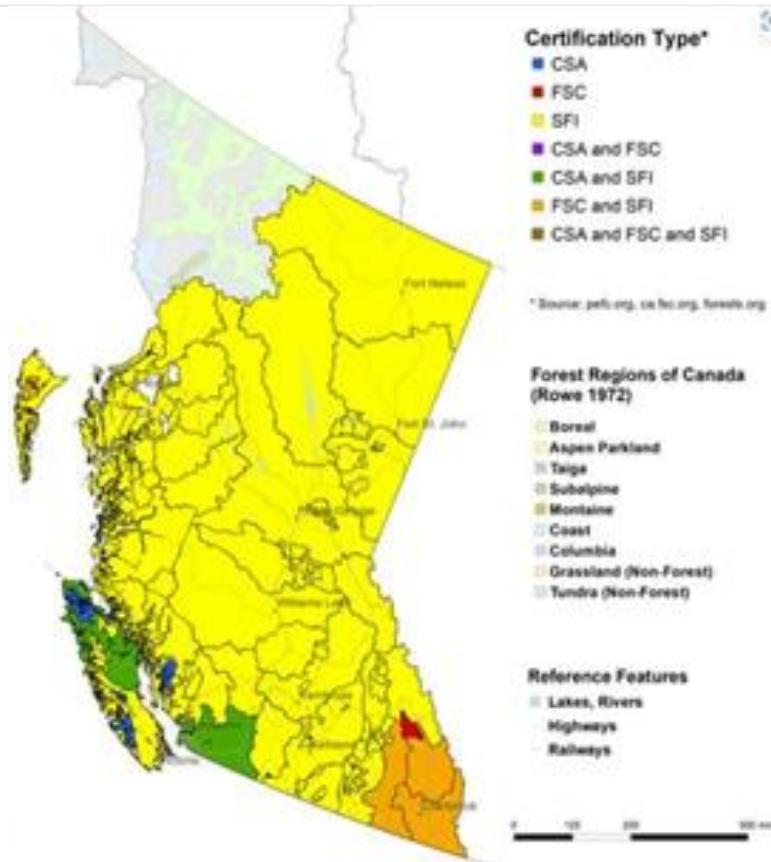
Currently, there is no formal program to measure the effectiveness of harvesting operations on other private land in BC. Monitoring is at the discretion of individual landowners and subject to individual goals and objectives for the property. Enforcement of applicable legislation on other private land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

⁴¹ BC Ministry of Forests, [Private Managed Forest Land Act Program Review. Public Engagement. What We Heard](#), August 2019.

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 in Canada: Canadian Standards Association (CSA®), Sustainable Forestry Initiative (SFI®) and Forest Stewardship Council (FSC®). The CSA and SFI programs are both endorsed internationally by the Programme for the Endorsement of Forest Certification (PEFC). All three Certification schemes are applied within BC (Figure 18).

Figure 18: Certification Map of British Columbia



Certification Canada annually reports the organisations, hectares certified, and certification system for all provinces in Canada. Table 7 provides the hectares and percentages of each system within BC as reported by Certification Canada for 2023 Year-End Status Report.⁴²

Table 8 provides the proportion of each certification system.

Table 7: Certification by Ownership Type

Ownership		Certified Area	% Certified	Certified Area	% Certified
Type	Area	Incl double certification	Incl double certification	Excl double certification	Excl double certification
Crown Land (avail. for tenure)	64,975,488	44,650,603	69%	43,587,444	67%
Private Managed Forest Land and Other Private land	4,409,488	783,253	18%	780,089	18%
Total	69,384,976	45,433,856	65%	44,367,533	64%

Table 8: Certification Scheme Proportion by Ownership Type

Ownership Type	SFI		FSC		CSA		SFI & FSC		CSA & FSI	
	Ha	%*	Ha	%*	Ha	%*	Ha	%*	Ha	%*
Crown Land	41,321,077	91%	426,877	1%	773,167	2%	1,499,790	3%	629,692	1%
All Private Land	780,089	2%	0	0%	0	0%	0	0%	3,164	0%
Subtotal	42,101,166	93 %	426,877	1%	773,167	2 %	1,499,790	3%	632,856	1%
Total	45,433,856 ha						100%			

* - % of Certification total

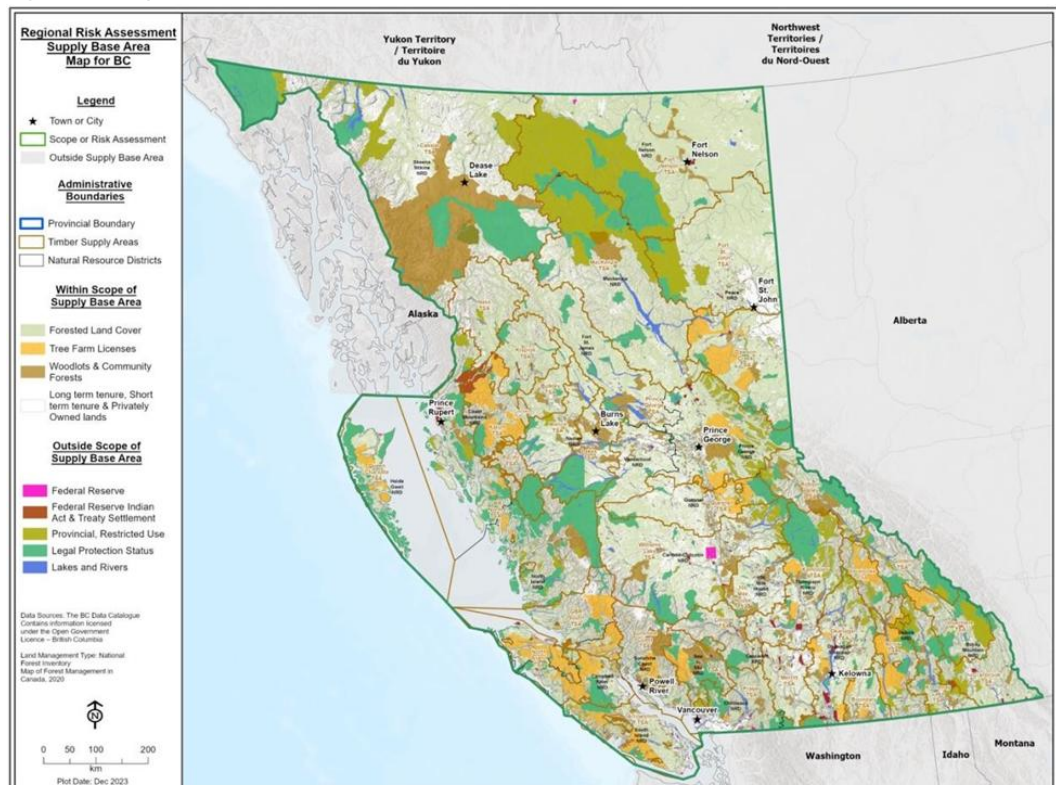
⁴² Certification Canada, [Forest Management Certification in Canada. 2023 Year-End Status Report. British Columbia](#), May 2024.

2.2

Statement of scope and sub-scopes

Figure 1 provides a map of the Supply Base Area within the province of British Columbia (BC). BC's land base is almost 95 million ha (946,460 km²). Forests cover approximately 60 million hectares (63%) of British Columbia's land base.¹ Crown land forests are roughly 57 million ha. Privately owned forest land is roughly three million ha, and approximately two million ha of that is suitable for timber harvesting.² Eighty-five per cent of timber harvesting occurs on Crown land.³

Figure 1: Scope of RRA



The RRA-BC scope is the harvestable forest land base of British Columbia.

¹ BC Government, [Timber Supply Review Backgrounder](#), April 2021.

² BC Ministry of Forests, [The State of the British Columbia's Forest. Third Edition](#), 2010.

³ BC Government, [Timber Supply Review Backgrounder](#), April 2021.

Following the requirements in SBP Standard 2 and SBP RRA Procedure, the Working Body evaluated the homogeneity of risk for the region under assessment—British Columbia—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
- Private Managed Forest Land
- Other Private Land

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 4.6.2.2 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 BC.

2.3

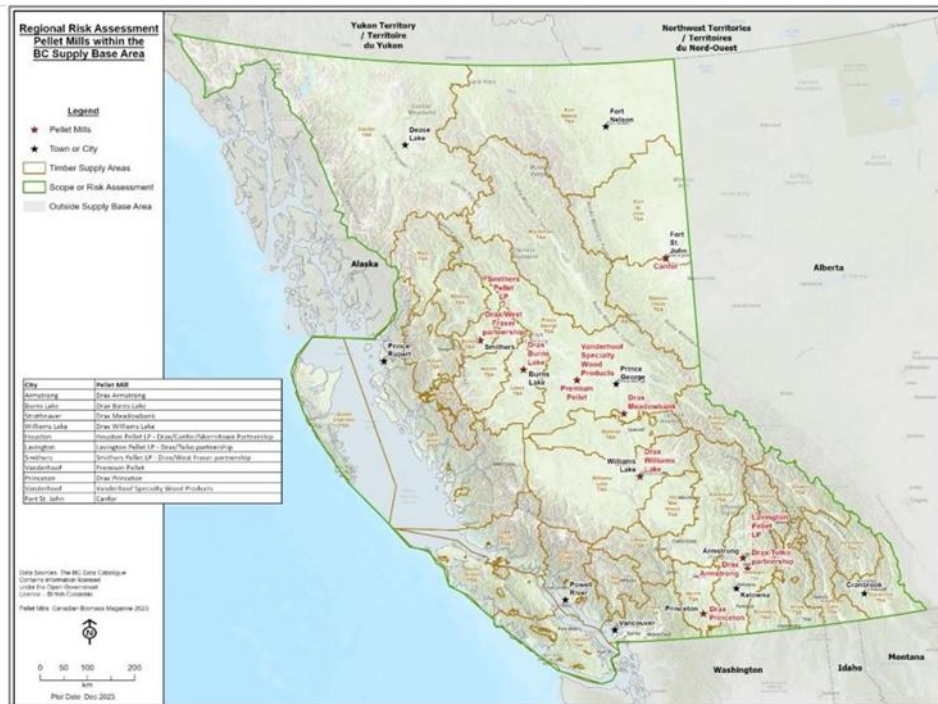
Overview of the local biomass sector

British Columbia (BC) has the largest forest sector in Canada and is highly integrated. BC predominantly manufactures solid wood products, the majority of which is softwood lumber. In 2022, BC's sales of wood products (lumber, veneer, plywood, engineered wood products) totalled \$15.1 billion, pulp and paper sales totalled \$5.0 billion.⁴³ Total sales value of wood pellets was not reported. The majority of BC's manufacturing is exported. In 2022, BC exported \$7.3 billion of softwood lumber (91% of total sales value) and \$470 million in pellets (> 95% of total sales value).⁴⁴ In 2022, Japan was the primary destination (52%) for pellets, with the UK second (19%).

BC's Pellet Industry

As of March 2024, 11 pellet plants are operating in BC (Figure 19). In 2024, BC facilities accounted for 41.1% of Canadian production capacity.⁴⁵

Figure 19: Location of Pellet Mills in British Columbia



All of BC's pellet industry is in the Interior region, where feedstock is more abundant. Many of the pellet plants are located close to large sawmills, which provide a source of feedstock. Table 9 lists the names, locations, Sustainable Biomass Program (SBP) certification, and capacity of the pellet facilities.⁴⁶

⁴³ BC Ministry of Forests, Economics and Trade Branch, [2022 Economic State of British Columbia's Forest Sector](#), 2022.

⁴⁴ Ibid.

⁴⁵ [Canadian Wood Pellet Producer Map](#), pellet.org, Wood Pellet Association of Canada, 2024.

⁴⁶ Ibid.

⁴⁷ SBP Audit Reports, 2021 to 2023.

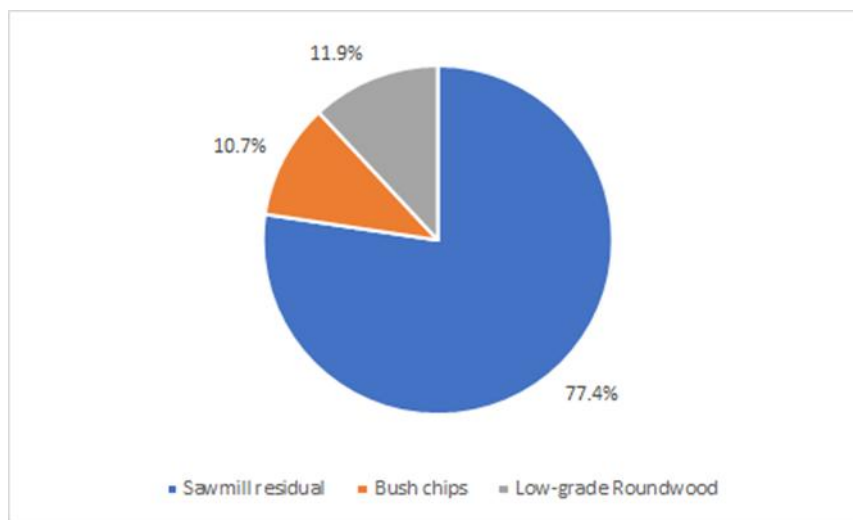
Table 9: 2024 Capacity of Pellet Mills in British Columbia

Biomass Producer	Mill Location	SBP Certified	2024 Capacity (tonnes/yr)
Drax	Armstrong	Yes	72,000
Drax	Burns Lake	Yes	400,000
Drax	Houston	Yes	220,000
Drax	Lavington	Yes	300,000
Drax	Princeton	Yes	90,000
Drax	Smithers	Yes	140,000
Drax	Strathnaver	Yes	230,000
Drax	Williams Lake	Yes	215,000
Canfor	Fort St. John	Yes	75,000
Premium Pellets	Vanderhoof	Yes	230,000
Vanderhoof Specialty	Vanderhoof	No	19,000

Total	1,991,000
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Fibre sourcing was reported in the most recent SBP Audit Reports (2022) for nine of the 11 BC pellet facilities. The SBP Audit Reports show that 77.4% of the furnish used to make pellets came from mill residuals (Figure 20)⁴⁸. The residuals include chips, shavings, sawdust, and bark, as well as trim ends and other miscellaneous pieces ground by the pellet mill. Chips produced in the forest accounted for 10.7% of the furnish and the remaining 11.9% of the feedstock originated from low-quality roundwood chipped at the pellet facility. Feedstock comes from residuals of sawmilling and harvest activities and wood that cannot be used for other purposes.

Figure 20: Pellet Input Fibre by Feedstock



3 Methodology

Working Body for the preparation of 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 British Columbia, as discussed in Section 2 Statement of Scope.

3.1 Data collection

The RRA approach is based on a due diligence system that includes Information Gathering (Section 3.1.1) and Risk Assessment (Section 3.1.2). In addition to the guidance provided in SBP documents, the Working Body completed extensive research on risk-based assessments, including but not limited to SBP-endorsed RRAs, FSC-PRO-60-002 v3-0, FSC- PRO-60-006b v2-0, FSC-NRA-CA v2.0, and FSC-NRA-USA v1-0. This analysis was incorporated into the Working Body Risk Evaluation Framework (REF) enabling a consistent, rigorous, and objective process for evaluation leading to a comprehensive risk conclusion for each of the 42 Indicators. The RRA-BC aims to provide an effective and verifiable process that will assure end users that feedstock is legally and sustainably sourced from any forested land base in British Columbia. The scope of the RRA-BC covers the first two elements: Information Gathering (Section 3.1.1) and Risk Assessment (Section 3.1.2).

3.2 Selection of indicators to be updated

Updated SBP Standards 1–6 were approved in March 2023 following a comprehensive review process. The updated criteria and indicators in Standard 1: Feedstock Compliance now form version 2.0 (v2.0) and these provide the framework for undertaking a new Regional Risk Assessment (RRA).

Standard 1 (v2.0) includes 10 new indicators and most other indicators from v1.0 have been revised. The availability of new information relevant to nearly all indicators meant that some level of updating of the previous Quebec RRA was necessary.

The three levels of update are categorised as follows:

- New additions: For new indicators in Standard 1 (v2.0), detailed RRA findings have been developed from scratch.
- Major updates: For the revised indicators in Standard 1 (v2.0) that were partially aligned with the indicators assessed in the original Quebec RRA, a new RRA assessment has been made including an information review, analysis and updated risk classification.
- Minor updates: For the revised indicators in Standard 1 (v2.0) that almost fully matched indicators from the original Quebec RRA, the information in the detailed findings of the RRA assessments is updated. Originally assigned risk classes have been reviewed and changed when necessary.

The level of update for each indicator is shown in Table 1 below.

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
1.1.1: Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.	None.	New addition
1.1.2: Legal ownership of land and resource use rights shall be respected.	1.2.1: Legality of ownership and land use can be demonstrated for the Supply Base.	Minor
1.1.3: Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.	1.3.1: Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements, and 1.5.1: Feedstock is supplied in compliance with the requirements of CITES.	Major
1.1.4: Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall, be complete and up to date.	1.4.1: Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.	Minor
1.1.5: There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.	2.4.3: There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment.	Minor

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
2.1.1: Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	2.1.1: Forests and other areas with high conservation values in the Supply Base are identified and mapped.	Major
2.1.2: 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.	2.1.2: Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.	Major
2.1.3: Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	2.2.4: Biodiversity is protected.	Major

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
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2.2.1: 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.	2.1.3: Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.	Major
2.2.2: Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	2.2.3: Key ecosystems and habitats are conserved or set aside in their natural state.	Major
2.2.3: Soil quality in the Supply Base shall be maintained or enhanced.	2.2.2: Feedstock is sourced from forests where management maintains or improves soil quality.	Minor
2.2.4: Where the removal of harvest forest residues and / or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	2.2.5: The process of residue removal minimises harm to ecosystems.	Minor
2.2.5: Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	2.2.6: Negative impacts on groundwater, surface water, and water downstream from forest management are minimised.	Minor
2.2.6: Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.	2.2.7: Air quality is not adversely affected by forest management activities.	Minor
2.2.7: 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	2.2.8: There is controlled and appropriate use of chemicals, and that integrated pest management (IPM) is implemented wherever possible in forest management activities.	Major
2.2.8: Waste shall be disposed of in an environmentally appropriate manner.	2.2.9: Methods of waste disposal minimise negative impacts on forest ecosystems.	Minor
2.2.9: Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.	2.3.1: Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.	Minor
2.2.10: Harvested areas shall be regenerated.	None.	New addition
2.2.11: The impacts of natural processes such as fires, pests and diseases shall be managed.	2.4.2: Natural processes, such as fires, pests and diseases are managed appropriately.	Minor
2.2.12: Genetically modified trees shall not be used.	2.10.1: Genetically modified trees are not used.	Minor

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
<p>3.1.1: LULUCF emissions shall be accounted for through one of the following routes:</p> <p>Route A 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>Route B 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>Route C 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>	<p>2.9.2: Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.</p>	<p>Major</p>

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
<p>3.2.1: All feedstock sourcing shall be consistent with either of these two options:</p> <p>Option A. 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>Option B. 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>	<p>None.</p>	<p>New addition</p>

3.2.2: 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.	None.	New addition
3.2.3: 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).	2.1.1: Forests and other areas with high conservation values in the Supply Base are identified and mapped. 2.9.1: Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.	Major

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
3.3.1: 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.	New.	New addition

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
4.1.1: Freedom of association and the right to collective bargaining shall be respected in the workplace.	2.7.1: Freedom of Association and the effective recognition of the right to collective bargaining are respected.	Minor
4.1.2: Forced or compulsory labour shall not be used.	2.7.2: Feedstock is not supplied using any form of compulsory labour.	Minor
4.1.3: Child labour shall not be used.	2.7.3: Feedstock is not supplied using child labour.	Minor
4.1.4: Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	2.7.4: Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.	Minor
4.1.5: 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.	2.7.5: Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.	Minor
4.1.6: Working hours shall comply with legal requirements.	None.	New addition

4.1.7: Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, workers' compensation.	None.	New addition
4.1.8: 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.	2.3.2: Adequate training is provided for all personnel, including employees and contractors.	Minor
4.1.9: Mechanisms shall be in place for resolving grievances and disputes in the workplace.	2.6.1: Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.	Minor
4.1.10: Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	2.8.1: Appropriate safeguards are put in place to protect the health and safety of forest workers.	Minor

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Quebec 2021	Level of update
4.2.1: Negative social and community impacts shall be identified and avoided.	None.	New addition
4.2.2: Feedstock sourcing shall positively contribute to the local economy, including employment.	2.3.3: Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy including employment.	Minor
4.2.3: Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced.	2.5.2: Production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.	Minor
4.2.4: 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.	2.5.1: The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected.	Minor
4.2.5: Mechanisms shall be in place for resolving grievances and disputes, relating to tenure and use rights of the forest and other land management practices.	2.6.1: Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.	Minor

4.2.6: Where Indigenous Peoples' rights are identified in the Supply Base, and FPIC has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.	None.	New addition
4.2.7: Designated cultural heritage sites shall be preserved.	None.	New addition

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.
- Risk assessment: Defines the level of risk by considering the probability/likelihood against the consequence/severity.

The REF provides a hierarchical set of questions to evaluate risk. The Working Body interprets the probability/likelihood as the management system and the consequence/severity as the performance measure as shown in the figure below.

Using the REF, the Working Body evaluated relevant information for each Indicator by Sub-scope at the provincial/regional scale (vs. individual forest management unit level). Table 2 describes evaluation criteria and logic that were considered for all Indicators and Sub-scopes to designate risk when evaluating the information (i.e., means of verification) gathered in the previous step relative to the identified threat. Assessing the probability/likelihood was verified through the evaluation criteria described in Table 2.

Table 2: Risk Evaluation Criteria

The Rationale for Risk Designation logic is summarised in Table 3. The best case scenario to rationalise low risk is that all four components of the REF verify evidence that the threat/impact is managed. As

Evaluation Criteria	Examples by sub-scopes		
	Crown Land	Private Managed Forest Land and Other Forest Land	Province
Context	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.		
Potential Threat/ Impact	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.		
Regulatory Framework	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.		
Means of Verification (MoV)	Regulatory framework	Limited & program specific regulatory framework	Regulatory framework
Implementation Mechanisms	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.).		
MoV	Legislative & BMP mechanism	Limited & program-specific legislative & BMP mechanisms	Regulatory framework
Oversight Framework	Describe the oversight framework of the Indicator relative to the threat/impact reviews applicable compliance/enforcement or monitoring frameworks.		
MoV	FOR Inspections, FOR compliance & enforcement, government &/or NGO analysis/assessments	Managed Forest Council audits for private managed forest land and bylaw enforcement for both	Oversight framework
Results	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.		
MoV	Government &/or NGO analysis/assessments	Managed Forest Council reports for private managed forest land and bylaw enforcement reports for both	Government &/or analysis/assessments
Rationale of Risk Designation	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. 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.		

illustrated below, specified risk occurs when there is a gap in verifiable evidence for one or any of the components. If, however, there is verifiable evidence that only the current condition is met then low risk may be designated. The Working Body acknowledges this latter situation could occur, but it does not support a rigorous REF. This latter situation would require continuous verification, which is not appropriate for the RRA, but might be verifiable for a Supply Base Evaluation.

Table 3: Risk Designation Logic Matrix

Threat due to forest mgt	Yes	Yes	Yes	Yes	Yes
Legislation Framework	Met	Met	Met	Gap	Gap
Mechanism of Implementation	Met	Met	Gap	Gap	Gap
C&E &/or Monitoring Framework	Met	Gap	Gap	Gap	Gap
Current Condition / Situation	Met	Gap	Gap	Gap	Met
Risk Designation	Low	Specified	Specified	Specified	Low

Although spatial data was collected and analysed, it was not used to designate risk. It was used to provide context, as well as information regarding location, scale, and intensity. The Working Body did not identify any new or additional risk factors beyond those identified in SBP Standard 1: Feedstock Compliance. The Working Body utilised the SBP Risk Reporting Template as provided in the RRA Procedures; however, it provided sub-headings to match the evaluation criteria and logic. As required by SBP Standard 2, a single risk rating is provided for each Sub-scope, resulting in each Indicator having more than one risk rating (see Table 10: Proposed Risk Designation Summary).

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 Land	Private Managed Forest Land	Other Private Land
1.1.1	Low risk	-	-	-
1.1.2	-	Low risk	Low risk	Low risk
1.1.3	Low risk	-	-	-
1.1.4	-	Low risk	Low risk	Low risk
1.1.5	-	Low risk	Low risk	Low risk
2.1.1	Low risk	-	-	-
2.1.2	Low risk	-	-	-
2.1.3	-	Specified risk	Specified risk	Specified risk
2.2.1	-	Specified risk	Specified risk	Specified risk
2.2.2	-	Low risk	Low risk	Specified risk
2.2.3	-	Low risk	Low risk	Specified risk
2.2.4	-	Low risk	Low risk	Low risk
2.2.5	-	Low risk	Low risk	Specified risk
2.2.6	-	Low risk	Low risk	Low risk
2.2.7	-	Low risk	Low risk	Low risk
2.2.8	-	Low risk	Low risk	Low risk
2.2.9	-	Low risk	Low risk	Specified risk
2.2.10	-	Low risk	Low risk	Specified risk
2.2.11	-	Low risk	Low risk	Low risk
2.2.12	Low risk	-	-	-
3.1.1	Low risk	-	-	-
3.2.1	Low risk	-	-	-
3.2.2	-	Low risk	Low risk	Specified risk
3.2.3	-	Specified risk	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	-	-	-
4.1.8	Low risk	-	-	-
4.1.9	Low risk	-	-	-
4.1.10	-	Low risk	Low risk	Specified risk
4.2.1	-	Low risk	Specified risk	Specified risk
4.2.2	Low risk	-	-	-
4.2.3	-	Low risk	Low risk	Specified risk
4.2.4	-	Low risk	Specified risk	Specified risk
4.2.5	-	Low risk	Low risk	Low risk
4.2.6	-	Low risk	Specified risk	Specified risk
4.2.7	Low risk	-	-	-

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Principle 1 – Feedstock is legally sourced

Criterion 1.1 – Operators and operations are legal

1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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. 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. 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 & Land Use, 1.1.3 Trade Requirements and 1.1.5 Protection from Illegal & Unauthorised Activities.</p> <p>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. The Criminal Code of Canada is the principal anti-corruption legislation, prohibiting corruption, bribery, influence peddling, extortion and abuse of office. The British Columbia (BC) Ombudsperson Act establishes the BC Office of the Ombudsperson. The BC Professional Governance Act establishes the Office of the Superintendent of Professional Governance. The British Columbia Public Interest Disclosure Act provides a framework for employees to report specific kinds of serious wrongdoing with legislated protection from reprisal.</p> <p>Enforcement and monitoring 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. The Code is nationally applicable and is implemented in BC through the Ministry of Public Safety and Solicitor General and Ministry of the Attorney General. The Ministries prosecute crimes and share information relative to legal issues. The BC Ombudsperson Act is implemented by the BC Office of the Ombudsperson. The BC Professional Governance Act is implemented by the Office of the Superintendent of Professional Governance.</p> <p>Many international organisations monitor and report on corruption levels around the globe. The Criminal Code is enforced throughout Canada by the RCMP, local police, and the judicial system. The BC Ombudsperson receives complaints of corruption in public systems and conducts independent investigations. The Superintendent of Professional Governance provides oversight to professional associations, including Forest Professionals British Columbia.</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). GAN Integrity</p>

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	<p>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. 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. A 2016 news release from Interpol states that global corruption in forestry accounts for USD 29 billion in global trade. A search of the Office of the Ombudsperson’s case summaries shows one instance in which forestry was involved. The case was concerned with public versus private board meetings for a local community forest. The 2022/23 Annual Report (the latest available report as of September 2023) stated that the Office heard 7,323 complaints and assigned 1,367 to investigators. The report highlighted three cases which involved the BC Ministry of Forests and environmental concerns. The Office of the Superintendent of Professional Governance’s 2022/23 Annual Report (the latest available as of September 2023) states that the Office received 17 complaints related to forest professionals in BC; 12 of these were referred to the Investigation Committee. Additionally, the report states that two disciplinary actions, one consent order and one reprimand letter, were taken against forest professionals in BC. An internet review conducted in September 2023 does not indicate there are any concerns with rule of law in forestry in BC.</p> <p>Risk conclusion and justification</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 British Columbia. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level for British Columbia.</p>
<p><i>Supply Base Verifiers</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites • Company human resources policies/procedures, including anti-bribery policies and codes of conducts • Chain of custody procedures, including fibre tracking • Fibre procurement policy & procedures • Company regulatory registry • Forest management plans • Best management practices • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Supplier verification program • Publicly available information (reports, news & websites) • Interviews with regulatory/oversight agency • Interviews with trade unions • Interviews with workers
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Justice Laws. Criminal Code of Canada. • NCASI. Canadian Forestry Regulations and Standards. 2021.

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	<ul style="list-style-type: none"> Royal Canadian Mounted Police. Report Corruption. <p><u>Provincial</u></p> <ul style="list-style-type: none"> Professional Governance Act. Ombudsperson Act. Public Interest Disclosure Act. BC Office of the Ombudsperson. Homepage. BC Office of Ombudsperson. Village of McBride. BC Office of Ombudsperson. Annual Report. 2022/2023. Office of the Superintendent of Professional Governance. Homepage. Office of the Superintendent of Professional Governance. Annual Report.2022/23. <p><u>Other</u></p> <ul style="list-style-type: none"> Sustainable Biomass Program. Guidance for SBP Standard 1:Feedstock Compliance. 28 April 2023. Transparency International. Country Data – Canada. 2022. GAN Integrity. Country Profiles – Canada. 05 November 2023. World Bank. Interactive Data Access – Canada. 05 November 2023. World Bank. Worldwide Governance Indictors – Overview. Interpol. Global corruption in forestry sector worth USD 29 billion a year. 09 December 2016. Organization for Economic Co-operation and Development. Corruption in the Extractive Value Chain. 2016. Transparency International. Corruption in the Extractive Industries.
<i>Risk rating</i>	Low risk
1.1.2	Legal ownership of land and resource use rights shall be respected.
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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 & Unauthorised Activities. See Section 4.6 Forest Sector by Land Ownership for more information. 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</p>

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	<p>regarding permitted land use would have similar effects.</p> <p><u>Federal</u></p> <ul style="list-style-type: none"> • Constitution Act of 1867 <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forest Act • Land Title Act <p>Enforcement and monitoring</p> <p>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 Forest Act, overseen by the British Columbia (BC) Ministry of Forests (FOR), provides the legal authority for the provincial government to issue licences. Land use plans identify permitted land uses, including which lands are available for forestry. Tree Farm Licences are long-term, replaceable, area-based licences granted by the provincial government. A variety of licence types can be issued by the provincial government on the Timber Supply Areas, ranging from long-term to short-term, that provide the licensee with rights to harvest timber. FOR’s forest management system identifies which Crown lands are available for timber harvesting and which areas are not due to various restrictions for ecological or social reasons. BC’s Land Title Act provides the legal basis for private ownership of land including private managed forest land and other private land in the province, and it sets out dispute resolution mechanisms and processes. The Act is administered by FOR and titles are overseen by the Land Title and Survey Authority of British Columbia. On private managed forest land and other private land, owners control the trees and may harvest and process or sell/trade the timber, provided that appropriate regulations are met. Private land that is enrolled in the Private Managed Forest Land Program must follow program requirements to remain in the program and receive a reduction in the property tax rate. The province is well surveyed.</p> <p>On Crown land, FOR has enforcement mechanisms in place to ensure that the terms of licences issued by the province are upheld. Permitting requirements ensure that forestry does not occur where it is not an allowable land use. The provincial court system is available to handle disputes that cannot be settled otherwise. On private managed forest land, the Private Managed Forest Land Council undertakes an annual audit program to assess compliance with regulatory requirements. On private managed forest land and other private land, any disputes 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>The ownership of forest land is surveyed and well-established in BC. 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.</p> <p>Risk conclusion and justification</p> <p>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, private managed forest land, and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites

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	<ul style="list-style-type: none"> • Strategic land use planning (i.e. landscape-level) • Forest management plans • Chain of custody procedures, including fibre tracking • Fibre procurement policy & procedures • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Supplier verification program • Publicly available information (reports, news & websites) • Tenure/licence agreements • Ownership titles & land surveys • Supplier transportation documentation (origin) • Interviews with regulatory/oversight agency • Interviews with tenure agreement holders 						
<i>Evidence reviewed</i>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Constitution Act of 1867. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forests Act • Land Titles Act • Managed Forest Council • Private Managed Forest Land Regulation 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.						
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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"> 1. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); 						

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2. European Union Timber Regulation (EUTR);
3. UK Timber Regulation;
4. Japan Clean Wood Act; and
5. Korea Act on the Sustainable Use of Timbers.

CITES

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.

EUTR

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).

UK Timber Regulation

The UK Timber Regulation mirrors the EUTR and pertains to wood products imported to the UK.

Japan Clean Wood Act

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.

Korea Act on the Sustainable Use of Timbers

The Korea Act on the Sustainable Use of Timbers requires imports of wood products to have appropriate documentation on origin. 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. The potential for illegal harvest of wood is further discussed in Indicators 1.1.1 Comply with Laws, 1.1.2 Legal Ownership & Land Use and 1.1.5 Protection from 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

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a CITES permit.

Illegal Harvesting Initiatives

Legal mechanisms, as defined in the British Columbia (BC) Forest and Range Practices Act; the Forest Act and numerous regulations 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 the 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 BC, FrontCounterBC has the licencing responsibility for wildlife harvesting. The Ministry of Environment and Climate Change Strategy help ensure provincial implementation of WAPPRIITA.

Illegal Harvesting Initiatives

The BC Forest and Range Practices Act; the Forest Act and regulations are implemented by the BC Ministry of Forests, who provide information on the website and maintain forms to be used for transportation.

CITES

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

Illegal Harvesting Initiatives

The BC Ministry of Forests oversees the implementation of the BC Forest and Range Practices Act, the Forest Act and regulations, 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. An internet search conducted in September 2023 did not identify any concerns with the import or export of CITES listed species into or from BC.

Illegal Harvesting Initiatives

See Indicator 1.1.5 Protection from Illegal & Unauthorised Activities for results on legality of harvest in BC. An internet search conducted in September 2023 did not find any concerns with non-compliance of the BC legislation for transportation nor any concerns with forest products exported from BC meeting international trade regulations.

Risk conclusion and justification

CITES

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 British Columbia.

Illegal Harvesting Initiatives

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	<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 Illegal & Unauthorised Activities); and a well-regulated system of forest product transportation under the Forest Act in BC. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level for British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites • Chain of custody procedures, including fibre tracking • Fibre procurement policy & procedures • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Supplier verification program • Publicly available information (reports, news & websites) • Supplier transportation documentation (origin & species) • Interviews with regulatory/oversight agency • Interview with experts
<p><i>Evidence reviewed</i></p>	<p><u>CITES</u></p> <p><u>International</u></p> <ul style="list-style-type: none"> • Convention on International Trade in Endangered Species of Wild Fauna and Flora <p><u>Federal</u></p> <ul style="list-style-type: none"> • Government of Canada. Trade in protected species: Canadian act and regulation for wild animal and plant protection. • Government of Canada. Trade in Protected species: Canadian act and regulation for wild animal and plant protection: report. • Government of Canada. Trade in protected species: relevant authorities. <p><u>Illegal Harvesting Initiatives</u></p> <p><u>International</u></p> <ul style="list-style-type: none"> • Forest Legality Initiative. Laws & Policies. • Timber Trade Portal. Japan Clean Wood Act. • NepCon. Basic EUTR: How to Get Started. • Korea Forest Service. Korea's regulation to promote legal timber trade. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • British Columbia Forest and Range Practices Act. • Forest Act. • Forest Planning and Practices Regulation. • Ministry of Forests. Forest Tenures.

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<i>Risk rating</i>	Provincial Low risk
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis Timber harvesting on Crown land, private managed forest land, and other 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 timber is known as stumpage and is often charged as a rate per cubic metre of timber. Stumpage rates vary by species, grade/quality, and potential 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 managed forest land owners treat proceeds from the sale of standing timber as revenue. Other private land owners receive payments from the sale of standing timber as income. See Section 4.6 Forest Sector by Ownership for more information. 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.</p> <p><u>Provincial</u></p> <ul style="list-style-type: none"> • BC Land Act • Forest Act (Minimum Stumpage Regulation) • Private Managed Forest Land Act • Taxation (Rural Area) Act • Logging Tax Act • Taxation (Rural Area) Act <p>Transactions involving timber harvested from private managed forest land and other private land are governed by contract law.</p> <p>Enforcement and monitoring The British Columbia (BC) Ministry of Forests (FOR) administers the Forest Act, which states all timber harvested in the province must contain a timber mark (Part 5) and be scaled (Part 6), which provides the basis for stumpage charges to be determined (Part 7). The logging tax applies to individuals or corporations that have income from logging operations conducted on any of the three ownerships. The tax is paid based on revenue from logging operations less expenses. FOR is authorised by the BC Land Act and Forest Act to set and collect stumpage on Crown timber (and rent on Crown land). The BC government derives revenue through the tenure system in the form of stumpage and annual rent. For Crown timber, the provincial Harvest Billing System tracks timber marks and volumes to determine the stumpage owed by each company by timber</p>

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mark. The timber mark is used to identify harvested timber from cut block through to scaling and invoicing to provide a complete audit path and ensure that no harvested timber is unaccounted for. Stumpage must be paid for all trees cut and removed from provincial Crown land. Scale data is used to calculate the amount owed to the government from the harvest of Crown timber. On private managed forest land and other private land, there will typically be a written contract between the landowner and the timber purchaser that includes a purchase price or a formula for determining the purchase price of the timber. Payments for timber harvested from private managed forest land and other private land are made as prescribed in the contractual agreement. Scale data is used by industry for transactions related to timber from private managed forest land and other private land, such as the purchase or sale of forest products and contractor payment. The Taxation (Rural Areas) Act, overseen by the BC Ministry of Finance stipulates that all private landowners (both private managed forest land and other private land) must pay property tax. Owners of private managed forest land pay property taxes to the government on the bare land value and on the value of timber. The value of the bare land portion is applied annually by local tax authority. The value of the timber is added to the property tax two years after the harvesting activity. Property taxes must be up to date when a property is sold.

Owners of other private land pay property tax based on the assessment undertaken by the municipality.

FOR has a number of compliance and enforcement mechanisms that minimise the probability of non-payment of stumpage for Crown timber. These include, but are not limited to:

- Severe penalties for unmarked or incorrectly marked timber marks;
- Contraventions associated with non-compliance of the Forest Act;
- Stumpage re-determination, if submitted information is inaccurate;
- Inspection and audit of records by FOR;
- Remedies to recover delinquent payments.

The conditions of sale/purchase of private timber, whether it is from private managed forest land or other private land, 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 managed forest land or other 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 land, private managed forest land, and other private land regarding payments and contracts. As of March 2024, there is no publicly available information indicating non-payment for harvested timber is widespread or systemic from Crown land, private managed forest land, or other private land.

Risk conclusion and justification

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. Timber sales on private managed forest land and other private land are conducted under contract law, which is enforced in BC. 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, private managed forest land, and other private land in British Columbia.

Means of verification

- Regulatory framework
- Regulatory agency websites
- Chain of custody procedures, including fibre tracking
- Fibre procurement policy & procedures

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	<ul style="list-style-type: none"> Regulatory compliance and enforcement data/reports Oversight agency database records and/or reports Stumpage payment records Supplier transportation documentation (origin & species) Supplier invoices (origin & species) Interviews with regulatory/oversight agency Interview with suppliers 						
<i>Evidence reviewed</i>	<p>Provincial</p> <ul style="list-style-type: none"> Annual Timber rents and fees Coastal Appraisal Manual Forest Act Interior Appraisal Manual Land Act Logging Tax Act Minimum Stumpage Rate Regulation Taxation (Rural Areas) Act 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p>						

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For the assessment of this Indicator, the confirmation/verification of legally harvested timber and origin is paramount and interconnected with Indicators 1.1.1 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

- BC Land Act
- Forest Act
- Forest and Range Practices Act
- Minimum Stumpage Rate Regulation
- Scaling Regulation
- Timber Marking and Transportation Regulation
- Private Managed Forest Land Act
- The Assessment Act (BC Assessment)
- Mineral Tenure Act

Enforcement and monitoring

Crown Land

The British Columbia (BC) Ministry of Forests (FOR) is authorised through legislation to set and collect stumpage on Crown timber (and rent on Crown land). Forest tenures are the agreements between a company or individual and the BC government grants the rights and outlines conditions (through either licences or permits) where timber is harvested from Crown land. On Crown land, crown licensees must harvest timber subject to a Forest Stewardship Plan, associated regulations, and government approval and permits administered by FOR. All timber harvested from Crown land in BC must have a timber mark and be scaled, which provides the basis for stumpage charges to be determined. A timber mark certifies ownership of the logs and helps prevent theft of timber from Crown land. Timber must be transported to a scale site designated by FOR.

Private Managed Forest Land

On private managed forest land, the landowner is responsible for supervision of illegal activity, encroachment or trespass. For private managed forest land, there will usually be a written contract between the landowner and the timber purchaser that includes a purchase price or a formula for determining the purchase price of timber.

Any disputes that may arise over private managed forest land timber sales would be addressed through the provincial legal system. A timber mark is required to transport logs from private managed forest land. If timber is being transported from the private managed forest land, it must be transported to a scale designated by FOR.

Other Private Land

On other 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. A private timber mark is required to transport logs from other private land.

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

Crown Land and Private Managed Forest Land

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	<p>Unauthorised activities are enforced by the Compliance and Enforcement Branch (CEB) of FOR. The CEB has the authorisation to inspect, investigate and take enforcement actions. The scope of CEB includes but is not limited to: unauthorised timber harvesting, trespass issues, damage to the environment, water stewardship, fish habitat, abandoned tenures and unauthorised structures, forest operations, range practices, forest recreation use, off-road vehicles and access management, environmental protections, wildfire use, wildlife habitat protection, and road construction, maintenance, deactivation, and use (industrial). The Harvest Billing System is FOR's scale data management and invoicing system. Scaling data is submitted by industry to FOR electronically, then data is validated and stumpage invoices or volume statements are calculated, issued, and delivered to clients via the Harvest Billing System.</p> <p>FOR has several compliance and enforcement mechanisms that minimise the probability or impact of non-compliance of stumpage for Crown timber, which include:</p> <ul style="list-style-type: none"> • Severe penalties for unmarked or incorrectly marked timber marks; • Contraventions associated with non-compliance of the Forest Act; • Stumpage re-determination, if submitted information is inaccurate; • Inspection and audit of records by FOR; • Remedies to recover delinquent payments. <p>The Forest Practices Board conducts independent audits to investigate alleged contraventions.</p> <p><u>Other Private Land</u></p> <p>Any private land logs that are transported off the property must have a private timber mark. Scaling must be conducted at an approved scale site for any logs which are transported. The scaling information is reported to FOR to be inputted into HBS. FOR is responsible for compliance and enforcement of the transportation of logs from other private land.</p> <p><u>Crown Land and Private Managed Forest Land</u></p> <p>The Natural Resource Compliance and Enforcement Database is a publicly available database to track contraventions of provincial legislation regarding natural resources. From 2018 to 2023, there have been two tickets issued to individuals for failure to have written record of transported timber; one in 2019, and one in 2022. This database captures infractions applicable to provincial legislation on Crown land and private managed forest land. CEB produces an annual report that contains information on inspections, compliance actions, and enforcement actions related to legislation governing forest, lands, range, water, and natural resource activities.</p> <p><u>Other Private Land</u></p> <p>As of March 2024, there is no publicly available information indicating widespread or systemic occurrences of resource extraction conflicts, encroachment, or trespass on other private land.</p> <p>Risk conclusion and justification</p> <p>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, private managed forest land, and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites • Forest management plans • Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures

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	<ul style="list-style-type: none"> • Chain of custody procedures, including fibre tracking • Fibre procurement policy & procedures • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Site plans and/or post-activity inspections demonstrate negative impacts mitigated • Supplier verification program • Supplier transportation documentation (origin & species) • Supplier invoices (origin & species) • Interviews with regulatory/oversight agency • Interview with suppliers 						
<p><i>Evidence reviewed</i></p>	<p>Provincial</p> <ul style="list-style-type: none"> • Assessment Act • Coastal Appraisal Manual • Forest Act • Forest and Range Practices Act • Forest Practices Board • Land Act • Mineral Tenure Act • Minimum Stumpage Rate Regulation • Natural Resource Compliance and Enforcement Reporting • Natural Resource Compliance Reports and Statistics • Private Managed Forest Land Act • Scaling Manual • Scaling Regulation • Timber Marking and Transportation Regulation • Forest and Range Practices Act, Part 5 – Protection of Resources • Forest and Range Practices Act, Part 6 – Compliance and Enforcement • Natural Resource Officers 						
<p><i>Risk rating</i></p>	<table border="0"> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
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Other Private Land	Low risk						

Principle 2 – Feedstock sourcing does not harm the environment

Criterion 2.1 – Biodiversity is maintained or enhanced

<p>2.1.1</p>	<p>Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.</p>
<p><i>Findings</i></p>	<p>Scale of assessment Provincial</p> <p>Analysis Biodiversity is defined as the variety of and natural processes that maintain ecosystems, genes, and species on earth. Due to its complexity, the most effective way to assess biodiversity maintenance or enhancement is through proxies. In Criterion 2.1, the associated Indicators—2.1.1 Key Eco/HCV Identified, 2.1.2 Key Eco/HCV Threats ID & 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.</p> <p><u>Landscape-level Biodiversity Values (Coarse scale)</u> 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 (>5,000 ha) and/or Intact Forest Landscapes (> 50,000 ha).</p> <p><u>Stand-level Biodiversity Values (Medium/Fine Scale)</u> 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. 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. Indicator 2.1.2 Key Eco/HCV Threats ID & 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. 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, private managed forest land, and other private land.</p> <p>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> <u>Federal</u></p> <ul style="list-style-type: none"> • Species at Risk Act (SARA) • Migratory Birds Convention Act (MCBA) • Fisheries Act

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- Canada National Parks Act

Provincial

- Environment and Land Use Act
- Ecological Reserve Act
- Park Act
- Forests and Range Practices Act (FRPA)
- Forest Statutes Amendment Act

Stand-level Biodiversity Values (Medium/Fine Scale)

Federal

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

Provincial

- Forests and Range Practices Act
- Wildlife Act
- Park Act
- Land Act
- Environment Management Act
- Fisheries Protection Act
- Oil and Gas Activities Act
- Forest Statutes Amendment Act
- Private Managed Forest Land Act
- Environment and Land Use Act
- Ecological Reserve Act
- Forest and Range Practices Amendment Act
- Forest Statutes Amendment 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 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.

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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 British Columbia Conservation Data Centre (BCCDC), within the British Columbia (BC) Ministry of Water, Land and Resource Stewardship (WLRS), identifies species of animals, plants, lichens, and fungi as critically imperilled, or special concern. Every five years, the BCCDC provides updates to COSEWIC for evaluation in the federal SARA identification and listing. National parks, provincial parks, and protected areas identified in BC 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 national parks.

At the provincial level, the BC government defines and manages lands for conservation and management of fish and wildlife habitat for the benefit of regionally or internationally significant fish and wildlife species. BC government designates these 'conservation lands'.

Land designations that contribute to conservation are spatially defined areas established through legislation or purchased for the protection of nature and cultural values, the conservation of biological diversity and ecosystem services, and the management of natural resources. Conservation land designations include parks, areas identified to protect species at risk or cultural heritage, and areas that are identified to manage the balance of conservation of nature and economic opportunities. Land designations that contribute to conservation are summarized in three categories: Protected Lands, Resource Exclusion Areas, and Spatially Managed Areas. Global Forest Watch completes analysis and produces publicly available maps that spatially identify Intact Forest Landscapes globally, including the province of BC.

ECCC SAR Registry identifies 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. BCCDC identifies provincially listed species at risk and ecosystems at risk, including federal SARA listed species. Lists are updated annually and publicly available on-line with a mapping tool.

BCCDC and NatureServe provide listing of the globally and provincially ranked RTE ecosystems in BC. WLRS habitat identification includes identified wildlife and wildlife with legislated land designations. Species with legislated land designations are identified under the Wildlife Management Areas Regulation of the Wildlife Act.

In BC, species at a significant global, regional or national level and wide-ranging species at risk include Woodland and southern mountain caribou, as well as 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, conservancies, designations and ecological reserves. A combined total of protected areas is estimated around 14.1 million hectares. The spatial delineation and actual hectares for each of the protected areas is available on authorising agencies website. WLRS reports on the status of land designations intended to contribute to conservation in BC. The last publicly available summary of land designation status in 2017 has the following:

- Protected Lands—cover 15.4% of BC—including all parks & protected areas (15.0%) and Other Protected Lands (0.4%) with the primary purpose of the long-term conservation of nature and cultural values.
- Resource Exclusion Areas—covers 12.4% of BC—including all designations that fully exclude one or two resource activities for the purpose of conservation.
- Spatially Managed Areas—covers 24.5% of BC—including spatial designations managing development or a resource activity for the purpose of conservation—

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but where conservation is not the sole or primary objective—and resource activity is still allowed to occur. The designations within this category vary significantly in purpose and scope of management.

An interactive map provides current information about the locations and habitat values of conservation lands, with a focus on Wildlife Management Areas and other administered conservation land sites or complexes. The Government of British Columbia Data Catalogue also provides open access to a downloadable data-set of conservation lands in various formats, along with a cross-reference to the overlapping NGO Conservation Areas data-set. These can be uploaded into common mapping software tools. Global Forest Watch's most current report (2022) identifies and maps 23.7 million ha of Intact Forest Landscapes in BC, in both the timber harvesting and non-timber harvesting landbase.

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 BCCDC follows the same process for identification as listed in landscape-level biodiversity values above. BC's Wildlife Act, overseen by WLRS, enables habitat identification for species requiring land designation for protection. Stand level requirements are facilitated by specific land designation under regulation in the Wildlife Act. A Wildlife Management Area is an area of land designated for the benefit of regionally to internationally significant fish and wildlife species or their habitats. Wildlife Management Areas are part of BC's Conservation Lands Program. The Forest and Range Practices Act (FRPA) enables the establishment of two categories of wildlife which require special management attention to address the impacts of forest and range activities on Crown land. The two categories are Species at Risk and the Regionally Important Wildlife. Together these two categories of wildlife are referred to as Identified Wildlife under the Identify Wildlife Management Strategy (IWMS). IWMS Species Accounts documents are produced that identify key habitat attributes for species persistence, conservation and management.

BCCDC uses NatureServe North American protocol to rank globally and provincially identified ecosystems. NatureServe shares BCCDC data with the International Union for Conservation of Nature (IUCN) for global rankings and maps. BCCDC lists and ranks RTE ecosystems that occur in BC and assess status rank according to risk level and threats and map known occurrences. Ecosystems are identified using the BC Biogeoclimatic Ecosystem Classification system and can be mapped with terrestrial ecosystem mapping at the stand level. FOR through FPRA and FPPR identify the key habitat attributes to be retained at the stand-level. These attributes provide structures that are needed to sustain forest dwelling species and biodiversity at the stand level. Attributes identified include but not limited to maintaining standing dead trees (snags), live residual trees, retention patches, structural complexity and old forest retention, as well as habitat requirements of species of special management. Legal objectives for old growth forest retention have been established for forested Crown land throughout BC, either spatially defined in old growth management areas (OGMAs), or through non-spatial landscape level targets. Legal objectives vary across regions, with differences in the age-based definitions of old growth forest, the age, amount to retain (e.g. targets) and analysis units. As a result of the Old Growth Strategic Review report, A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems, FOR is implementing a new approach to the management of old growth forests. Priority old forests have been identified and deferred from harvesting. Recommendations from the strategic review are currently being implemented, including identification of old growth areas. Voluntary deferrals are put in place where First Nations and industry have worked together to come to an agreement to avoid harvesting for a period of time. This allows time for local decision making on long-term management approaches.

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, BCCDC, under WLRS oversees the species at risk including the Federal SARA, BC Wildlife Act and Fish Protection

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Act. As well, BCCDC oversees RTE ecosystems under the Wildlife Act. Both WLRS and FOR oversee wildlife under various legislation and programs. WLRS and the ECCS oversee land designations and protected lands. BC Parks under ECCS oversees Provincial Parks. FOR also oversee land designations that include protection and/or restriction requirements. FOR under FRPA oversees forest planning and practices related to biodiversity values. FOR and ECCS jointly oversee the Cumulative Effects Framework. Global Forest Watch is responsible for oversight of Intact Forest Landscapes identification process.

BCCDC identifies provincially listed species at risk and ecosystems at risk, including federal SARA listed species which are updated annually and publicly available on-line with a mapping tool. Based on species habitat needs IWMS species and habitats are identified. Information is available in the IWMS Species Accounts website. FOR through FPRA and FPPR identify the key habitat attributes to be retained at the stand-level. These attributes provide structures that are needed to sustain forest dwelling species and biodiversity at the stand level. Attributes identified include but not limited to maintaining standing dead trees (snags), live residual trees, retention patches, structural complexity and old forest retention, as well as habitat requirements of species of special management. Complex stand structure is a key feature of old forests. In identifying old forests, the report A New Future for Old Forests, A Strategic Review of How British Columbia Manages for Old Forest Within its Ancient Ecosystems (2020) indicates there is 13.2 million ha old growth (23%) in the BC forest inventory, 11.1 million ha excluding private land.

In 2021, the Old Growth Technical Advisory Panel identified 2.6 million ha of the 13.2 million ha from the Review as “priority” old growth for deferral from harvest. Selection of high priority deferral sites was based on big trees, large remnants, ancient old growth, and intact watersheds.

Risk conclusion and justification

There is a comprehensive federal and provincial regulatory framework with appropriate protocols and experts to identify of 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 British Columbia.

Means of verification

- SAR Public Registry – SARA listed species, critical habitat & recovery plans
- BCCDC listed species and ecosystems (Species and Ecosystem Explorer)
- Government Actions Regulation – species or area specific
- IWMS Accounts
- Global Forest Watch Intact Forest Landscape statistics and mapping
- National and Provincial Parks boundary maps
- Protected areas boundary maps and protection measures
- BC Regional and Sub-Regional Land use plans and Implementation Strategies
- Indigenous Protection and Conservation Areas
- Old Growth forest Management Areas
- Old growth forest deferral mapped areas
- Terrestrial ecosystem mapping

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	<ul style="list-style-type: none">• BC Vegetation Resources Inventory• DataBC – GIS data, shapefiles and/or maps (static and interactive)
<i>Evidence reviewed</i>	<p><u>International</u></p> <ul style="list-style-type: none">• Global Forest Watch• HCV Resource Network• HCV Resource Network Common Guidance for the Identification of High Conservation Values.• Intact Forest Landscapes, map• IUCN Globally Threatened Ecosystems• Nature Serve Canada• NatureServe Conservation Status categories• Shape of Nature Globally threatened ecosystems <p><u>Federal</u></p> <ul style="list-style-type: none">• 2020 Wild Species Report• Canada National Parks Act• Environment and Climate Change Canada• Fisheries Act• Migratory Birds Convention Act• Species at Risk Act• Species at Risk Public Registry <p><u>Provincial</u></p> <ul style="list-style-type: none">• A New Future for Old Forests A Strategic Review of How British Columbia Manages for Old Forests Withing its Ancient Ecosystems• Accounts and Measures for Managing Identified Wildlife• BC Ecological classification system• BC Endangered Species list (includes ecosystems) and mapping tool• BC Provincial Parks• Description of enabling legislation for Species at risk• EFlora BC Atlas- searchable database- interactive database, map and photos• Environment and Land Use Act• Environmental Management Act• Environmental Reporting BC. 2017. Land Designations that Contribute to Conservation in B.C. State of Environment Reporting, Ministry of Environment and Climate Change Strategy, British Columbia, Canada.• Find Conservation Lands - Map and Primary Contacts• Forest and Range Practices Amendment Act

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	<ul style="list-style-type: none"> • Forest Statutes Amendment Act • Forest Stewardship Plans • Forest Stewardship Plans: Mandatory amendments, certification and declared areas • Forests and Range Practices Act • Identified Wildlife Management Strategy • Land Act • Mapping of the Interior Wetbelt Forests and Interior Temperate Rainforests • National Parks in BC • Old Growth Strategic Review Process • Park Act • Priority Deferrals: An Ecological Approach • Private Managed Forest Land Act • The Inland Temperate Rainforest and Interior Wetbelt Biomes of Western North America • Wildlife Act <p>Other</p> <ul style="list-style-type: none"> • BC Species at Risk listing and Critical Habitat identification • BC's Old Growth Forest: A Last Stand for Biodiversity • Red-Listed Ecosystem Status of Interior Wetbelt and Inland Temperate Rainforest of British Columbia, Canada • Species at risk recovery in BC: and Audit of Federal and Provincial Actions
<i>Risk rating</i>	Provincial Low risk
2.1.2	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.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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. The scope of Indicator 2.1.2 Key Eco/HCV Threats ID & 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. 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, private managed forest land, and other private land.</p>

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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.

Landscape-level Biodiversity Values (Coarse Scale)

Federal

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

Provincial

- Environment and Land Use Act
- Ecological Reserve Act
- Park Act
- Forests and Range Practices Act (FRPA)
- Forest Statutes Amendment Act

Stand-level Biodiversity Values (Medium/Fine Scale)

Federal

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

Provincial

- Forests and Range Practices Act (FRPA)
- Wildlife Act
- Park Act
- Land Act
- Environment Management Act
- Fisheries Protection Act
- Oil and Gas Activities Act
- Forest Statutes Amendment Act
- Private Managed Forest Land Act
- Environment and Land Use Act
- Ecological Reserve Act
- Forest and Range Practices Amendment Act
- Forest Statutes Amendment Act Park Act

Enforcement and monitoring

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 British Columbia (BC) Ministry of Waters, Land and Resource Stewardship (WLRS) 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 the British Columbia Conservation Data Centre (BCCDC) listing process. The process includes threat evaluations for populations and habitats and to prepare and implement recovery plans. There are two federally listed wide-ranging species at risk with threat assessments included in recovery plans: woodland caribou and grizzly bear. BC's Wildlife Act enables the WLRS to prepare and implement recovery plans for threatened and endangered species based on evaluation of primary threats. National parks, provincial parks and protected areas in BC 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. Land conservation or protected areas have threats evaluations built into the management plans and restrictions requirements. Global Forest Watch provides evaluation of change detection over time and an assessment of fragmentation threats of Intact Forest Landscapes.

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. This enables species recovery strategy/plans, critical habitat identification and public posting. 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, BCCDC provides both provincially and federally listed species at risk. BCCDC completes threat evaluations to guide recovery planning including the identification of critical habitat for these listed species. Recovery plans with critical habitat identification have not been completed for all species.

WLRS has led or co-led in the development of recovery plans for both species-at-risk and ecosystems, including federally listed species-at-risk. The recovery plans include evaluations of threats to populations and habitats. Caribou (woodland and mountain) is a federally listed wide ranging forest species at risk. WLRS has developed and implemented a recovery plan for mountain caribou with threat assessments included in recovery plan. WLRS has developed a draft Woodland

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Caribou Protection and Recovery Plan with the objective of recovering populations across the range to self-sustaining levels capable of supporting Indigenous sustenance harvest. The plan includes identification of critical habitat, threat evaluation for habitat protection, habitat restoration, habitat offsetting, wildfire management, and predator management. As of March 2024, the recovery plan for woodland caribou is under review. The IWMS Species Accounts evaluate threats to selected species populations and ecosystems. These accounts are available online. Wildlife stewardship plans are developed that include threat evaluation for protection of key ecological attributes for species persistence. National parks, provincial parks and protected areas in BC are selected to conserve [large landscapes](#) that include unique ecosystems that may be threatened by urban and resource development. Global Forest Watch's current report (2022) identifies 23.7 million ha of [Intact Forest Landscapes](#) in BC, 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)

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, BCCDC conduct threat evaluations for species at risk with small home ranges and RTE ecosystem ranking. WLRS, under the Identified Wildlife Management Strategy (IWMS) evaluates stand level threats to identified legislated wildlife. Under the two Identified Wildlife categories defined in FRPA, the species at risk category include endangered, threatened, or vulnerable species of vertebrates and invertebrates, and endangered or threatened plants and ecosystems that are negatively affected by forest or range management on Crown land and are not adequately protected by other mechanisms. Whereas the Regionally Important Wildlife category include species that are considered important to a BC region, rely on habitats that are not otherwise protected under FRPA, and may be adversely impacted by forest or range practices. FOR sets out management objectives for stand-level biodiversity in FPPR. Threats to biodiversity, including key habitat attributes have been evaluated by FOR and listed on FOR biodiversity websites related to the attributes. Requirements to mitigate the threats are provided in FPRA, FPPR, GAR, and as well as through the application of a range of policy tools, bulletins, guidance documents, and letters of expectations. The Old Growth Strategic Review report, A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems, identifies threats to old forests and provides a suite of 14 recommendations. Recommendations are being actioned as provided in BC Government action plan, A New Future for Old Forests – From Review to Action.

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, BCCDC, under WLRS oversees the species at risk including the Federal SARA, BC Wildlife Act and Fish Protection Act. As well, BCCDC oversees RTE ecosystems under the Wildlife Act. Both WLRS and FOR oversee wildlife under various legislation and programs. WLRS and the ECCC oversee land designations and protected lands. BC Parks under ECCC oversees Provincial Parks. FOR also oversee land designations that include protection and/or restriction requirements. FOR under FRPA oversees forest planning and practices related to biodiversity values. FOR and ECCC jointly oversee the Cumulative Effects Framework. 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.

Some of the above discussed results in landscape-level biodiversity values is applicable to stand-level biodiversity values threats evaluation. [Small home range species at risk](#) and [RTE ecosystems](#) are assessed for threats reported in BCCDC conservation status reports or recovery strategies. These are posted in the BCCDC Registry and accessible through the web-based BC Species and ecosystem Explorer. BCCDC has identified globally and provincially listed [RTE ecosystems](#) and

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	<p>provides threat assessments where completed. FRPA management objectives for stand-level biodiversity outlined in FPPR address the threats related to conservation of biodiversity values, including <u>key habitat attributes</u>. FOR hosts biodiversity websites related to the attributes, threats and the management. Requirements to mitigate the threats are provided in FPRA, FPPR, GAR, and as well as through the application of a range of policy tools, bulletins, guidance documents, and letters of expectations. In 2021, the Old Growth Technical Advisory Panel evaluated candidates and threats based on the 2020 evaluation in the old growth strategic review. The Panel identified 2.6 million ha of priority old growth for deferral from harvest, selecting high priority deferral old growth sites using big treed, remnant, and ancient old growth and intact watersheds for identification. The priority old growth selection process assessed persistence threat in the near term either through forest management or resource development and access management.</p> <p>Threats to old growth forests persistence were included in the selection process identifying priority at-risk old growth forests for deferral from logging. These deferrals will form key stand level components of landscape planning.</p> <p>Risk conclusion and justification</p> <p>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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • SAR Public Registry – SARA listed species, critical habitat & recovery plans • BCCDC listed species and ecosystems (Species and Ecosystem Explorer) • Government Actions Regulation – species or area specific • IWMS Accounts • Global Forest Watch Intact Forest Landscape statistics and mapping • National and Provincial Parks boundary maps • Protected areas boundary maps and protection measures • BC Regional and Sub-Regional Land use plans and Implementation Strategies • Indigenous Protection and Conservation Areas • Old Growth Management Areas • Old growth deferral mapped areas • Terrestrial ecosystem mapping • BC Vegetation Resources Inventory • DataBC – GIS data, shapefiles and/or maps (static and interactive)

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<i>Evidence reviewed</i>	<p><u>International</u></p> <ul style="list-style-type: none">• Global Forest Watch• HCV Resource Network• HCV Resource Network Common Guidance for the Identification of High Conservation Values.• Intact Forest Landscapes, map• IUCN Globally Threatened Ecosystems• Nature Serve Canada• NatureServe Conservation Status categories• Shape of Nature Globally threatened ecosystems <p><u>Federal</u></p> <ul style="list-style-type: none">• 2020 Wild Species Report• Canada National Parks Act• Environment and Climate Change Canada• Fisheries Act• Migratory Birds Convention Act• Species at Risk Act• Species at Risk Public Registry <p><u>Provincial</u></p> <ul style="list-style-type: none">• A New Future for Old Forests A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems• Accounts and Measures for Managing Identified Wildlife• BC Ecological classification system• BC Endangered Species list (includes ecosystems) and mapping tool• BC Provincial Parks• Description of enabling legislation for Species at risk• EFlora BC Atlas- searchable database- interactive database, map and photos• Environment and Land Use Act• Environmental Management Act• Environmental Reporting BC. 2017. Land Designations that Contribute to Conservation in B.C. State of Environment Reporting, Ministry of Environment and Climate Change Strategy, British Columbia, Canada.• Find Conservation Lands - Map and Primary Contacts• Forest and Range Practices Amendment Act• Forest Statutes Amendment Act• Forest Stewardship Plans• Forest Stewardship Plans: Mandatory amendments, certification and declared areas
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	<ul style="list-style-type: none"> ● Forests and Range Practices Act ● Identified Wildlife Management Strategy ● Land Act ● Mapping of the Interior Wetbelt Forests and Interior Temperate Rainforests ● National Parks in BC ● Old Growth Strategic Review Process ● Park Act ● Priority Deferrals: An Ecological Approach ● Private Managed Forest Land Act ● The Inland Temperate Rainforest and Interior Wetbelt Biomes of WesternNorth America ● Wildlife Act <p><u>Other</u></p> <ul style="list-style-type: none"> ● BC Species at Risk listing and Critical Habitat identification ● BC's Old Growth Forest: A Last Stand for Biodiversity ● Red-Listed Ecosystem Status of Interior Wetbelt and Inland TemperateRainforest of British Columbia, Canada ● Species at risk recovery in BC: and Audit of Federal and Provincial Actions
<i>Risk rating</i>	Provincial Low risk
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>See Indicator 2.1.1 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. The scope of Indicator 2.1.2 Key Eco/HCV Threats ID & 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. 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, private managed forest land, and other private land.</p>

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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.

Federal

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

Provincial

- Environment and Land Use Act
- Ecological Reserve Act
- Park Act
- Forests and Range Practices Act (FRPA)
- Wildlife Act
- Park Act
- Land Act
- Environment Management Act
- Fisheries Protection Act
- Oil and Gas Activities Act
- Private Managed Forest Land Act
- Environment and Land Use Act
- Ecological Reserve Act
- Forest and Range Practices Amendment Act
- Forest Statutes Amendment Act

Enforcement and monitoring

Provincial

Protection of large landscapes at the provincial level by the Government of British Columbia (BC) 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, private managed forest land, and other private land management units. In BC, Intact Forest Landscapes are not legislated or recognised beyond 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, private managed forest land, and other private land.

Crown Land

On Crown land, the BC Ministry of Forests (FOR) has authority to administer the Forest and Range Practices Act (FRPA) which provides the regulatory framework

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for the protection and conservation of biodiversity related to forest management. Biodiversity is one of eleven resource values required to be managed and protected by Crown licensees under FRPA. Under FRPA, Government Actions Regulation (GAR) provides direction for establishment of land designations and features that require special management, such as landscape-level and stand-level biodiversity. GAR regulates how government establishes the measures or objectives that pertain to the designated land areas. FOR sets management objectives for landscape-level and stand-level biodiversity in the Forest Planning and Practices Regulation (FPPR). Under FPPR, Crown licensees are required to prepare Forest Stewardship Plans (FSPs) to be consistent with FRPA's objectives for landscape-level and stand-level biodiversity values. Practice requirements in regulation and approved results and strategies in FSPs translate FRPA objectives into practices on the ground.

The FSPs components related to maintenance and enhancement of identified biodiversity values include:

- 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;
- GARs provide stewardship measures to maintain and enhance; species at risk, regionally important wildlife, ecological communities at risk, ungulate winter ranges, wildlife habitat areas and wildlife management areas;
- Key habitat attributes are identified as anchors for stand level planning with retention and clearcut with reserve harvest systems
- Old Growth Management Areas (spatially defined) and non-spatial old growth landscape level targets are implemented with direction from FOR
- Priority old growth deferral areas identified for future protection FRPA implementation of planning and practice requirements is achieved through the application of a range of policy tools, such as bulletins, guidance documents, and letters of expectations from FOR identifying best management practices for resource values of concerns that need special attention.

FSPs include maps and supporting documents. FSPs must be shared and discussed with affected First Nations, as well as publicly available for review and input. FOR approve FSPs prior to forest management activities.

Private Managed Forest Land

The Private Managed Forest Land Act (PMFLA) requires land owners to develop and implement management commitments for fish habitat and critical wildlife habitat identification and protection. The PMFLA Regulation requires road construction and timber harvesting to protect water quality and fish habitat. As of March 2024, beyond these commitments, 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 managed forest land.

Other 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 other private land.

Federal

The Committee of the Status of Endangered Wildlife in Canada oversees SARA species, critical habitats and updates SARA listings annually. Fisheries and Oceans Canada oversees the Fisheries Act, Environment and Climate Change Canada oversees the MBCA, and Parks Canada oversees the National Parks Act.

Provincial

WLRS is responsible for oversight of implementation of the Wildlife Act.

Crown Land

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FOR is responsible for oversight of implementation of the FPRA. FOR reviews and approves Crown licensees FSPs for landscape-level and stand-level biodiversity values requirements as identified in the FPPR. FOR Compliance and Enforcement Branch (CEB) conducts inspections of primary forestry activities to ensure compliance with FRPA, FPPR, and approved operational plans as related to landscape-level and stand-level biodiversity requirements. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The Forest and Range Evaluation Program (FREP) measures the effectiveness of forest practices for biodiversity requirements, by monitoring and evaluating landscape-level and stand-level biodiversity condition. Monitoring protocol is specific to the FRPA value being evaluated. FREP provides reports specific to FRPA values and/or forest regions of concern. The Forest Practices Board (FPB) monitors and reports on forest practices for landscape-level and stand-level biodiversity requirements through audits and special investigations.

Private Managed Forest Land

The Managed Forest Council (MFC) is an independent provincial agency established under the PMFLA to administer and provide oversight of the Private Managed Forest Program. FOR may request formal audits to be conducted on the Private Managed Forest Land Program. MFC conducts annual inspections, with a target of inspecting 10% of all private managed forest land each year. Owners of private managed forest 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 managed forest land.

Other Private Land

Owners of other 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 other 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 and ecosystems at risk lists are publicly available through the federal SAR list, the BC Species and Ecosystem Explorer and CDC iMap applications. 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 BC 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, private managed forest land and other private land management units. In BC, 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 BC and not threatened by forest management.

Crown Land

In BC, there is one federally listed wide-ranging species at risk identified: Caribou, both the Woodland and Southern Mountain sub-species. For the Southern Mountain Caribou, a recovery plan including the critical habitat has been developed and is being implemented. The Southern Mountain Caribou recovery plan now has an Intergovernmental agreement signed for recovery plan. For the Woodland Caribou, a draft recovery plan has been developed. As of March 2024, the recovery plan for Woodland Caribou is under review and has not been implemented. Woodland Caribou herds have been identified and mapped in CDC iMap with associated draft herd plans. GAR land designations such as Wildlife Habitat Areas and Wildlife Management Areas, as well as Old Growth Management Areas are regulatory mechanisms to protect biodiversity values at the landscape-level and stand-level. Wildlife Habitat Areas, Wildlife Management Areas and Old Growth

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Management Areas provide protection for species-at-risk, critical habitat, old growth, RTE ecosystems, as well as maintenance of key habitat attributes such as stand structure retention. Management in and around applicable Wildlife Habitat Areas, Wildlife Management Areas and Old Growth Management Areas are described in FSPs; for the most part, these land designations are excluded from the timber harvesting land base. Within the timber harvesting land base, key habitat attributes are identified at the stand level and captured using clearcut-with-reserve or retention harvest systems with dispersed or patch retention anchored on concentrations of habitat attributes such as large live and dead trees and large coarse woody debris. These systems retain the structures and create stand level vertical and horizontal complexity. Legal objectives for old growth forest retention have been established for forested Crown land throughout BC, either spatially defined in Old Growth Management Areas or through non-spatial landscape level targets applied within FSPs. Legal objectives vary across regions, with differences in the age-based definitions of old growth forest, the age, amount to retain (e.g., targets) and analysis units. As a result, tracking the achievement of old growth forest objectives across the province is complicated. As of March 2024, the implementation of the Old Growth Strategic Review (2020) recommendations and three-year action plan has yet to be completed. Deferral areas are being decided and inclusion of deferrals in First Nations agreements or Forest Landscape Plans have also not been completed.

Private Managed Forest Land

The last formal audit of the private managed forest land program required by FOR was conducted in 2013. MFC published a report titled: Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the Private Managed Forest Land Act. The audit was carried out by a multidisciplinary team, including foresters, a geoscientist, and a biologist, who sampled approximately one-third of the managed forests in the program. Critical Wildlife Habitat was excluded from the audit scope. The report states that implementing the provisions for critical wildlife habitat protection is the responsibility of the Minister responsible for the administration of the Wildlife Act. The 2013 Audit further stated that no critical wildlife habitat has been designated on managed forest land to date. 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 managed forest land.

Other 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 Key Eco/HCV Maintained or Enhanced 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 Key Eco/HCV Identified Context section for details.)

Crown Land

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The Crown licensees' FSPs, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. 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. The BC 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;
- 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; and
- Priority old growth forest deferral areas and protection has not been completed and finalized.

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

Private Managed Forest Land and Other Private Land

There is federal and provincial regulatory framework for maintaining biodiversity values. On private managed forest land and other 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, a precautionary approach is applied. As such, this Indicator is designated as specified risk for private managed forest land and other private land in British Columbia.

Biodiversity Values – Maintained / Enhanced		<u>CrownLand</u>	<u>Private Managed Forest Land</u>	<u>Other Private Land</u>
LandscapeLevel	SAR – Caribou	S	S	S
	Large landscapes	L	L	L
	Intact Forest Landscapes	S	S	S
Stand Level	SAR – local /endemic	S	S	S
	RTE Ecosystems	L	L	L
	Key Habitat Attributes &Old Growth	S	S	S

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<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • SAR Public Registry – SARA listed species, critical habitat & recovery plans • BCCDC listed species and ecosystems (Species and Ecosystem Explorer) • Government Actions Regulation – species or area specific • IWMS Accounts • Global Forest Watch Intact Forest Landscape statistics and mapping • National and Provincial Parks boundary maps • Protected areas boundary maps and protection measures • BC Regional and Sub-Regional Land use plans and Implementation Strategies • Indigenous Protection and Conservation Areas • Old Growth Management Areas • Old growth deferral mapped areas • Terrestrial ecosystem mapping • BC Vegetation Resources Inventory • DataBC – GIS data, shapefiles and/or maps (static and interactive)
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • Global Forest Watch • HCV Resource Network • HCV Resource Network Common Guidance for the Identification of High Conservation Values. • Intact Forest Landscapes, map • IUCN Globally Threatened Ecosystems • Nature Serve Canada • NatureServe Conservation Status categories • Shape of Nature Globally threatened ecosystems <p><u>Federal</u></p> <ul style="list-style-type: none"> • 2020 Wild Species Report • Canada National Parks Act • Environment and Climate Change Canada • Fisheries Act • Migratory Birds Convention Act • Species at Risk Act • Species at Risk Public Registry <p><u>Provincial</u></p> <ul style="list-style-type: none"> • A New Future for Old Forests A Strategic Review of How British Columbia Manages for Old Forests Withing its Ancient Ecosystems

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	<ul style="list-style-type: none"> • Accounts and Measures for Managing Identified Wildlife • BC Ecological classification system • BC Endangered Species list (includes ecosystems) and mapping tool • BC Provincial Parks • Description of enabling legislation for Species at risk • EFlora BC Atlas- searchable database- interactive database, map and photos • Environment and Land Use Act • Environmental Management Act • Environmental Reporting BC. 2017. Land Designations that Contribute to Conservation in B.C. State of Environment Reporting, Ministry of Environment and Climate Change Strategy, British Columbia, Canada. • Find Conservation Lands - Map and Primary Contacts • Forest and Range Practices Amendment Act • Forest Statutes Amendment Act • Forest Stewardship Plans • Forest Stewardship Plans: Mandatory amendments, certification and declared areas • Forests and Range Practices Act • Identified Wildlife Management Strategy • Land Act • Mapping of the Interior Wetbelt Forests and Interior Temperate Rainforests • National Parks in BC • Old Growth Strategic Review Process • Park Act • Priority Deferrals: An Ecological Approach • Private Managed Forest Land Act • The Inland Temperate Rainforest and Interior Wetbelt Biomes of Western North America • Wildlife Act <p><u>Other</u></p> <ul style="list-style-type: none"> • BC Species at Risk listing and Critical Habitat identification • BC's Old Growth Forest: A Last Stand for Biodiversity • Red-Listed Ecosystem Status of Interior Wetbelt and Inland Temperate Rainforest of British Columbia, Canada • Species at risk recovery in BC: and Audit of Federal and Provincial Actions 				
<i>Risk rating</i>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-right: 1px solid black;">Crown Land</td> <td style="text-align: right;">Specified risk</td> </tr> <tr> <td style="border-right: 1px solid black;">Private Managed Forest Land</td> <td style="text-align: right;">Specified risk</td> </tr> </table>	Crown Land	Specified risk	Private Managed Forest Land	Specified risk
Crown Land	Specified risk				
Private Managed Forest Land	Specified risk				

Annex 1 Detailed findings for Supply Base Evaluation

	Other Private Land Specified risk
Criterion 2.2 – Ecosystem productivity, functions, and services are maintained or enhanced	
2.2.1	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
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Private Land</p> <p>Analysis The Sustainable Biomass Program (SBP) glossary defines:</p> <ul style="list-style-type: none"> • Conversion as “the process of changing or causing something to change from one form to another form.” • Deforestation as “the conversion of forest to another land use or the long- term reduction of tree canopy cover below the 10% threshold.” • Afforestation as “the conversion from other land uses into forest, or the increase of the canopy cover to above the 10% threshold.” <p>The focus of evaluation for this Indicator is on land classified as forest. 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.” 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. In Canada, the industrial groups contributing to deforestation include agriculture, built-up, forestry roads, hydro & hydro lines, mines, oil & gas, and transportation. The forestry industrial group has forest management type tenures. The other industry sectors (i.e., agriculture, built-up, hydro & hydro lines, mines, oil & gas, and transportation), do not have forest management tenures. Wetlands, peatlands, and grasslands ecosystems are not included in the evaluation of this Indicator because:</p> <ul style="list-style-type: none"> • Wetlands, peatlands, and grasslands within forested ecosystems are excluded from the timber harvesting land base and subsequently not harvested. • Afforestation of wetlands, peatlands, and grasslands does not occur. • Wetlands, peatlands, and grasslands ecosystems are unique habitats that have been identified as having relatively high carbon stocks. The carbon and climate 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. <p>Negative impacts of conversion include deforestation, fragmentation, altered or degraded habitat and ecosystems, reduced productive forest areas, and increased carbon emissions. <u>Crown land</u></p>

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- Forest and Range Practices Act (FRPA)
- Forest Planning and Practices Regulation (FPPR)

Private Managed Forest Land and Other Private Land

The Private Managed Forest Land Act

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.

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

The Forest and Range Practices Act (FRPA) administered by the British Columbia (BC) Ministry of Forests (FOR) requires all Crown licensees with forest management tenures to reforest following harvesting. Under FRPA, Forest Stewardship Plans (FSPs) have approved stocking standards that harvested areas must meet. The standards are identified in the silviculture plans and prescriptions in individual cutblock site plans. Conversion of forest to non-forest due to forestry activities on Crown land with forest management tenures is regulated by FRPA. Under FRPA, Crown licensees are allowed to convert forest to non-forest during the construction of permanent roads, landings, and infrastructure required for operations. The Forest Planning and Practices Regulation sets measurable practice requirements. FSPs detail Crown licensees 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.

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On Crown land, licensees with forest management tenures are required to update the Reporting Silviculture Updates and Land Status Tracking System (RESULTS). RESULTS manages the submission of openings, disturbances, silviculture activities, and obligation declarations as required by FRPA. Licensees are required to submit annual declaration data which is reviewed and approved by FOR. FOR Compliance and Enforcement Branch (CEB) periodically conducts inspections of active worksites to ensure FRPA objectives are met. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The Forest Practices Board audits and conducts special investigations to evaluate regeneration planning and practices. 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.

Results are verified by FOR and tracked by RESULTS (see results from Indicator 2.2.10 – Regen After Harvest). FOR tracks 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 Managed Forest Land and Other Private Land

The Private Managed Forest Land Program was established in 2003 under the Private Managed Forest Land Act, under which landowners commit to manage their property for long-term forest production, including meeting legislated objectives for key public environmental values. The goals of the program are to encourage private landowners to manage their lands for long-term forest production and encourage sustainable forest management practices. This Act applies to private managed forest land other than land that is in a tree farm licence area, a woodlot licence area or a community forest agreement area. Private Managed Forest Land (PMFL) designation is a specific tax status in British Columbia, that allows owners of forested private land to manage their forests for long-term production while receiving tax benefits. This designation is often part of a broader program that encourages responsible forest management practices. To be eligible for classification as managed forest, land must be a minimum of 25 hectares and be suitable for growing trees. The owner must commit to use the property for production and harvesting of timber and associated forest management activities. however the landowner

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

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. The Forest Planning and Practices Regulation sets measurable practice requirements. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Results verify compliance 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

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	<p>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 British Columbia.</p> <p><u>Private Managed Forest Land and Other 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 managed forest land and other private land in British Columbia.</p>						
<i>Means of verification</i>	<ul style="list-style-type: none"> • 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 • Deforestation/conversion 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 suppliers 						
<i>Evidence reviewed</i>	<p><u>International</u></p> <ul style="list-style-type: none"> • Sustainable Biomass Program Standards Glossary Version 2.0 <p><u>Federal</u></p> <ul style="list-style-type: none"> • National Deforestation Monitoring System • Canada's National Deforestation Monitoring System: System Description 2015 • The State of Canada's Forests Annual Report (2023) <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • Private Managed Forest Land Act Program Review 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Specified risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Specified risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Specified risk	Private Managed Forest Land	Specified risk	Other Private Land	Specified risk
Crown Land	Specified risk						
Private Managed Forest Land	Specified risk						
Other Private Land	Specified risk						

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2.2.2	<p>Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.</p>
Findings	<p>Scale of assessment Crown Land Private Managed Forest Land Private Land</p> <p>Analysis 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"> • Maintaining productivity: <ul style="list-style-type: none"> • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem • Indicator 2.2.9 – Long-term Production Capacity • Indicator 2.2.10 – Regen After Harvest • Maintaining soil productivity: <ul style="list-style-type: none"> • Indicator 2.2.3 – Soil Quality Maintained or Enhanced • Maintaining water quality and quantity: <ul style="list-style-type: none"> • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced • Managing natural disturbances: <ul style="list-style-type: none"> • Indicator 2.2.11 – Natural Processes are Managed <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"> • Indicator 2.2.3 – Soil Quality Maintained or Enhanced; • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem; • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; • Indicator 2.2.9 – Long-term Production Capacity; • Indicator 2.2.10 – Regen After Harvest; • Indicator 2.2.11 – Natural Processes are Managed. <p>Enforcement and monitoring See Indicators:</p> <ul style="list-style-type: none"> • Indicator 2.2.3 – Soil Quality Maintained or Enhanced; • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem;

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	<ul style="list-style-type: none"> • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; • Indicator 2.2.9 – Long-term Production Capacity; • Indicator 2.2.10 – Regen After Harvest; • Indicator 2.2.11 – Natural Processes are Managed. <p>See Indicators:</p> <ul style="list-style-type: none"> • Indicator 2.2.3 – Soil Quality Maintained or Enhanced; • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem; • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; • Indicator 2.2.9 – Long-term Production Capacity; • Indicator 2.2.10 – Regen After Harvest; • Indicator 2.2.11 – Natural Processes are Managed. <p>See Indicators:</p> <ul style="list-style-type: none"> • Indicator 2.2.3 – Soil Quality Maintained or Enhanced; • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem; • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; • Indicator 2.2.9 – Long-term Production Capacity; • Indicator 2.2.10 – Regen After Harvest; • Indicator 2.2.11 – Natural Processes are Managed. <p>Risk conclusion and justification</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 and private managed forest land in British Columbia. As such, this Indicator also has a low risk designation for Crown land and private managed forest land in British Columbia. Four 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; Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; 2.2.9 – Long-term Production Capacity, and 2.2.10 – Regen After Harvest) have a specified risk designation for other private land in British Columbia. As such, this Indicator also has a specified risk designation for other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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

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	<ul style="list-style-type: none"> • 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 						
<i>Evidence reviewed</i>	<p>See Indicators:</p> <ul style="list-style-type: none"> • Indicator 2.2.3 – Soil Quality Maintained or Enhanced; • Indicator 2.2.4 – Residue Removal Minimises Neg Impact to Ecosystem; • Indicator 2.2.5 – Water Quality/Quantity Maintained or Enhanced; • Indicator 2.2.9 – Long-term Production Capacity; • Indicator 2.2.10 – Regen After Harvest; • Indicator 2.2.11 – Natural Processes are Managed. 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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 Indicator 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/Quality Maintained 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.</p> <p>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"> • Forest and Range Practices Act (FRPA) 						

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- Forest Planning and Practices Regulation (FPPR)

Private Managed Forest Land

- Private Managed Forest Lands Act
- Private Managed Forest Land Regulation
- Private Managed Forest Land Council Regulation

Enforcement and monitoring

Crown Land

The British Columbia (BC) Ministry of Forests (FOR) has authority to administer the Forest and Range Practices Act (FRPA) which provides the regulatory framework for the protection and conservation of soil quality related to forest management. This is achieved through objectives set within FRPA. Soil is one of 11 resource values the BC government requires to be managed and protected. FOR ensures the protection, maintenance, and, where necessary, improvement of soils. This includes proper management and avoidance of terrain stability threats. Forest Stewardship Plans (FSPs) must address the government's objective for soils (Section 5, Forest Planning and Practices Regulation (FPPR)). In addition to FSPs, licensees must prepare individual site plans which identify soil disturbance limits to be applied to a site. The FPPR sets limits for soil disturbance caused by timber harvesting, with stricter limits prescribed on sensitive soils. Limitations are set for the rehabilitation of excessively disturbed areas and permanent access structures within cut blocks. Deactivated roads are to be revegetated where needed to reduce the likelihood of erosion. Prohibitions are set to prevent causing landslides.

Private Managed Forest Land

The Managed Forest Council (MFC) is an independent provincial agency established under the Private Managed Forest Land Act (PMFLA) to administer the Managed Forest Program and protect key environmental values on private managed forest land in BC. Soil conservation is one of five key managed objectives as described in the Private Managed Forest Lands Act (PMFLA). The MFC's Field Practices Guide is provided to private managed forest land owners as an aid to field decisions and practices to meet regulatory requirements. Soil conservation guidance is provided for road construction, maintenance and deactivation, timber harvesting, and reforestation.

Other Private Land

On other private land, there are no regulatory requirements to manage or maintain soil quality, however local governments may pass bylaws requiring the application for development permits before development (including timber removal) on steep terrain. Requirements vary by jurisdiction. As of March 2024, there is no publicly available information describing implementation mechanisms to manage or maintain soil quality on other private land.

Crown Land

On Crown land, FOR reviews and approves FSPs for soil quality requirements as identified in the FPPR. FOR Compliance and Enforcement Branch (CEB) inspects active worksites to ensure the objectives of FRPA are met. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The Forest and Range Evaluation Program (FREP) measures the effectiveness of forest and range practices on soils, by monitoring and evaluating soil condition. Soils are monitored through the Cutblock-Level Soil Resource Stewardship Monitoring Protocol. Data is collected and compared with acceptable operational standards to determine if results are consistent with the objective to maintain soil productivity and hydrologic function. The Forest Practices Board (FPB) audits and special investigations have evaluated soil conservation planning and practices.

Private Managed Forest Land

Annex 1 Detailed findings for Supply Base Evaluation

MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including soil conservation. MFC conducts annual inspections, with a target of inspecting 10% of all private managed forest lands each year. FOR may request formal audits to be conducted on the private managed forest land program.

Other Private Land

On other 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 other private land.

Crown Land

The 2016/17 Assistant Deputy Minister Resource Stewardship Report provides the most current, publicly available data relating to soils for six of the eight forest regions in BC. The regional percentage of sites evaluated as having high impacts on soils ranged from 6% to 58%. At a provincial level, when prorated against the total sample size of 145 sites, 26.6% of sites fell within the high impacts of soil category. As of March 2024, the FREP dashboard does not provide publicly available results for soils. The FPB annual audits and special investigations include evaluating soil conservation planning and practices. Within the last five audit periods (2018 to 2023), one soil disturbance finding was identified as an area requiring improvement.

Private Managed Forest Land

The last formal MFC audit of the private managed forest land program required was conducted in 2013. MFC published a report titled: Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the Private Managed Forest Land Act. The audit was carried out by a multidisciplinary team, including foresters, a geoscientist, and a biologist, who sampled approximately 1/3 of the managed forests in the program. The 2013 Audit reported that harvesting activities resulted in minimal soil disturbance and site loss. Auditors also found that road construction had been carried out without causing levels of soil disturbance beyond acceptable levels. More recent data is available in MFC annual inspections reports (2018 – 2022), stated that no compliance issues were found in relation to soils and conservation.

Other Private Land

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

Risk conclusion and justification

Crown Land

There is a comprehensive regulatory framework governing soil conservation on Crown land. The FPPR sets measurable practice requirements regarding soil disturbance limits, the number of permanent access structures, road deactivation and rehabilitation requirements, and maintenance of natural drainage patterns. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Inspection results 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 British Columbia.

Private Managed Forest Land

Audits and inspection reports completed by the MFC verified landowners comply with regulatory requirements for soil disturbance and road construction and maintenance. Based on the evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia.

Other 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 other private land in British Columbia.

Annex 1 Detailed findings for Supply Base Evaluation

<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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 • Soil 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
<p><i>Evidence reviewed</i></p>	<p>Provincial</p> <ul style="list-style-type: none"> • 2017 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • Assistant Deputy Minister’s Resource Stewardship Report (2016/17) • The Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • FPB Annual Report 2018-2019 • FPB Annual Report 2019-2020 • FPB Annual Report 2020-2021 • FPB Annual Report 2021-2022 • FPB Annual Report 2022-2023 • FREP Dashboard • FOR – Integrated Resource Monitoring • Natural Resources Compliance Database • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the

Annex 1 Detailed findings for Supply Base Evaluation

	PMFLA 2013						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						
2.2.4	Where the removal of harvest forest residues and / or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.						
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis Forest harvest residues refer to the fibre that is left 'in-block' (in the forest), in landings, or at 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 British Columbia (BC) stumps are not removed unless the site is being converted to a non-forest use (See Indicator 2.2.1 – Conversion – a, b, c, d). In BC, trees are brought to roadside and/or on landings for delimiting and cut to length. Harvest residue piled at roadside and/or landings 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.</p> <p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act • Forest Planning and Practices Regulation (FPPR) <p><u>Private Managed Forest Land and Other Private Land</u></p> <p>The Private Managed Forest Land Act Enforcement and monitoring</p> <p><u>Crown Land</u> On Crown land, British Columbia (BC) Ministry of Forests (FOR) has authority to administer the Forest Act, Forest and Range Practices Act (FRPA) and Forest Planning and Practices Regulation which provides the regulatory framework regarding timber utilisation and harvest residues. The right to harvest Crown timber, and requirement for licensees to carry out waste and residue assessments are identified in the Forest Act. All merchantable Crown timber is paid to FOR as either stumpage or waste. Crown timber merchantability specifications, and waste assessments requirements are identified in the</p>						

Annex 1 Detailed findings for Supply Base Evaluation

Provincial Logging Residue and Waste Measurement Procedures Manuals (both Interior and Coastal versions). All waste assessments must be completed or endorsed by a Registered Professional Forester (RPF). For merchantable Crown timber that is not cut and removed, waste assessments measure the volume and quantity left in the block (standing or felled timber that remains on site) and are submitted to FOR through the waste system. FOR issues billings for waste and charges the volume of merchantable waste against the licensee's harvest volume amount. The Harvesting Billing System (HBS) is FOR's scale data management and invoicing system. Scaling data is submitted by companies to FOR electronically. Waste assessments are submitted into the waste system and approved by FOR, and then transferred to HBS for invoicing purposes. FOR addresses harvest residue removal through the Residual Fibre Utilization Policy. The Policy focuses on improving the use of lower-quality timber in areas where there is demand for residual fibre from secondary users. Residual fibre rights are allocated under the Forests Act to holders of a fibre supply licence to cut, or fibre forestry licence to cut, which are not used by the individual or company that had conducted the original harvesting. A fibre supply licence to cut is a longer-term licence (maximum ten years) and covers a large area. A fibre forestry licence to cut provides short-term access to residual fibre not used by the individual or company that completed the original harvesting. FOR can also establish fibre recovery tenures under the Forest Act. Alternate Methods of Scale under the Residual Fibre Utilization Policy allows residual fibre to be removed from cutblocks during timber harvest. The Concurrent Residual Harvest Systems (Interior and Coastal) provide an alternative method of scale for low quality timber harvested. The intent of the Systems is to reduce costs and administrative barriers for operators to move residual fibre to market more quickly, and increase the amount of material available for secondary manufacturers. A Concurrent Residual Harvest System permit must be submitted to and approved by FOR. FPInnovations and the Forest Tenures Branch of FOR developed a Roadside Residual Handling Guideline to provide guidance for the handling of residual fibre for operators who conduct primary harvesting. Piling should be managed in a way that is efficient and cost effective for Biomass Producers to access fibre more easily. The Chief Forester Forest Management Options for Reducing Slash Pile Burning: Best Management Practices identifies proposed best management practices (BMPs) for reducing slash pile burning through planning, silviculture and harvesting practices. BMPs include identifying potential bioenergy options during the planning phase, promote partial cutting, allow additional wildlife tree retention areas with non-representative species, increase coarse woody debris requirements, process at the stump, scatter woody material within the block, and pile in a manner that facilitates biomass extraction. Coarse woody debris is an element of the biodiversity resource value identified in FRPA. Coarse woody debris retention is a legislated requirements in the Forest Planning and Practices Regulation. There are separate requirements for Coastal versus Interior coarse woody debris. The Chief Forester Guidance on Coarse Woody Debris Management provides guidance for managing coarse woody debris on Crown land.

Private Managed Forest Land and Other Private Land

The Private Managed Forest Land Program was established in 2003 under the Private Managed Forest Land Act, under which landowners commit to manage their property for long-term forest production, including meeting legislated objectives for key public environmental values. Due to its historical origin, much of the private forest land in B.C. is located near communities on productive land that is highly valued for multiple resources including timber production, fish and wildlife habitat, drinking water, and recreation. Only 40% of private managed forest land is included in the program. Reporting by private forestry operators is done via a one-page annual declaration form directly to the council. [Landowners may choose to exit the program at their discretion, subject to an exit fee.](#)

The majority of private forest land is located on southeastern Vancouver Island, and in the Kootenay region. Managed forest is a BC Assessment Authority land classification established in 1988 to encourage private landowners to manage their lands for long-term forest production, considering 5 keys environmental values: regeneration, soil conservation, drinking water, fish habitat, critical wildlife habitat

Annex 1 Detailed findings for Supply Base Evaluation

To be eligible for classification as managed forest, land must be a minimum of 25 hectares and be suitable for growing trees. The owner must commit to use the property for production and harvesting of timber and associated forest management activities. Regulations under the act provide additional detail to support the Managed Forest Council's administration of the program including provisions such as

- Requirements for landowners regarding management of environmental values
- Offences and fines for non-compliance with requirements established by the Council
- Procedures for determining exit fees
- Provisions for critical wildlife habitat for species at risk

These regulatory requirements are in addition to provincial and federal environmental laws that apply to all private landowners. These laws include the *Water Sustainability Act*, *Drinking Water Protection Act*, *Environmental Management Act*, *Wildlife Act*, *Wildfire Act*, and federal *Fisheries Act*, *Migratory Birds Convention Act*, and *Species at Risk Act*.

In 2019, the Private Managed Forest Land (PMFL) Program review was initiated to examine how well the program is meeting its goals to encourage private landowners to manage their lands for long-term forest production, and encourage sustainable forest management practices, including the protection of key public environmental values.

Crown Land

Waste assessments are conducted and submitted by licensees to be reviewed and approved by FOR through the waste system and transferred into HBS for invoicing purposes. Coarse woody debris is monitored by FOR's Forest and Range Evaluation Program (FREP).

Crown Land

Utilisation of Crown timber information can be accessed via the public HBS. On Crown land, the FREP dashboard identifies coarse woody debris targets and results as part of FRPA stand level biodiversity resource values. Of 3,000 sites inspections, 77% met or exceeded coarse woody debris volume targets, and 61% of sites met or exceeded coarse woody debris piece size (large piece) targets.

Private Managed Forest Land and Other Private Land

On private managed forest land and other 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. Timber utilisation information is publicly available. FREP data indicates that Crown licensees are retaining coarse woody debris on sites inspected. 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 British Columbia.

Private Managed Forest Land and Other Private Land

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	<p>There is no regulatory requirements regarding the removal of harvest residues on private managed forest land and other 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 managed forest land and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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 • Waste & residue 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
<p><i>Evidence reviewed</i></p>	<p>Provincial</p> <ul style="list-style-type: none"> • Chief Forester Forest Management Options for Reducing Slash Pile Burning: Best Management Practices • Chief Forester's Guidance on Coarse Woody Debris Management • Concurrent Residual Harvest System (Coast) • Concurrent Residual Harvest System (Interior) • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • FREP Dashboard – Stand Level Biodiversity • FREP: Forest and Range Evaluation Program. Field Guide for Stand-level Biodiversity Monitoring (2008) • https://www2.gov.bc.ca/gov/content/industry/forestry/forest-tenures/private-managed-forest-land • An Overview of B.C.'s Private Managed Forest Program - Managed Forest Council • Harvest Billing System

Annex 1 Detailed findings for Supply Base Evaluation

	<ul style="list-style-type: none"> • Provincial Logging Residue and Waste Measurement Procedures Manual – Interior Version • Provincial Logging Residue and Waste Measurement Procedures Manual – Coast Version • Residual Fibre Operational Support • Residual Fibre Utilization (Fibre Recovery Process) • Residual Fibre Utilization Policy • Waste Assessments Policy 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.						
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis 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 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.</p> <p><u>Federal</u></p> <ul style="list-style-type: none"> • Fisheries Act • Species at Risk Act • Canadian Navigable Waters Act • Canadian Environmental Protection Act <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) 						

Annex 1 Detailed findings for Supply Base Evaluation

- Private Managed Forest Land Act
- Riparian Areas Protection Act and 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, private managed forest, and other private land.

Crown Land

The British Columbia (BC) Ministry of Forests (FOR) has authority to administer the Forest and Range Practices Act (FRPA) which provides the regulatory framework for the protection and conservation of water quality related to forest management. This is achieved through objectives set within FRPA. Water quality, and fish/riparian areas are two of 11 resource values required to be managed and protected under FRPA. On Crown land, licensees’ Forest Stewardship Plans (FSPs) must address FRPA and Forest Planning and Practices Regulation (FPPR) objectives for water quality and fish/riparian areas. Water values are addressed through stream crossings, protection of fish and fish habitat, and protecting water quality. Individual operational site plans identify watercourse crossings, and all watercourses within or adjacent to the harvest area. Watercourses which require buffers or prescriptions are identified in the site plan and must be adhered to during harvesting operations.

Private Managed Forest Land

The Managed Forest Council (MFC) is the agency responsible for ensuring the protection of water quality related to the Private Managed Forest Land Act (PMFLA), which provides the regulatory framework for defining the management objectives on private managed forest land. The management objective related to water quality and protection from forest management activities is fish habitat. Protection of watercourses includes the retention of sufficient streamside mature trees and understory vegetation both during and after harvesting to protect fish habitat. The MFC’s Field Practices Guide is provided to private managed forest land owners as an aid to field decisions and practices to meet regulatory requirements. Water protection guidance is provided for road construction, maintenance and deactivation, timber harvesting, reforestation, stream classification, and riparian tree retention.

Other Private Land

Under the Riparian Areas Protection Act and Riparian Areas Protection Regulation, local government bodies develop and implement bylaws, policies or provisions which may be applicable to other private land, depending on the location of the land. There are development permits, zoning bylaw provisions, watercourse or environmental protection bylaws, and municipal policies in place, however there is no uniformity of requirements or implementation across local governments. As of March 2024, there is no publicly available information describing implementation mechanisms for water quality/quantity maintenance on other private land.

Federal

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

Provincial

Complaints specific to water can be made via the Report All Poachers and Polluters online system, phone or contact through the nearest Conservation Officer Service office.

Annex 1 Detailed findings for Supply Base Evaluation

Crown Land

On Crown land, FOR reviews and approves FSPs for riparian buffer requirements as identified in the FPPR. FOR Compliance and Enforcement Branch (CEB) conducts inspections of primary forestry activities to ensure compliance with FRPA, FPPR, and approved operational plans as related to water. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The Forest and Range Evaluation Program (FREP) measures the effectiveness of forest and range practices, including water quality, watersheds, fish habitat, and riparian areas, by monitoring and evaluating the condition of eleven resource values. FREP's monitoring of water quality effectiveness is through protocols that evaluate the likelihood of forestry disturbed sites to generate and transport fine sediment to natural water bodies, which include fish streams and/or drinking water sources. FREP assesses the effectiveness of riparian management in terms of stream and wetland functioning condition using indicators pertaining to both biological and physical processes. The Forest Practices Board (FPB) monitors water quality and quantity through audits and special investigations.

Private Managed Forest Land

MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, ensuring the protection of water quality. MFC conducts annual inspections, with a target of inspecting 10% of all private managed forest lands each year. These inspections assess roads built adjacent to streams, active stream crossings, protection of stream channel and banks, and road maintenance and deactivation. FOR may request formal audits to be conducted on the private managed forest land program.

Other Private Land

On other 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 water quality/quantity maintenance on other private land.

Crown Land

The CEB 2022/2023 Annual Report states 533 inspections were conducted related to water management. Of these inspections, 23 compliance notices and 19 warning tickets were issued. There were 605 enforcement actions taken by CEB in 2022/2023. Enforcement actions related to water quality or quantity were not separate in the Annual Report. The 2019 Assistant Deputy Minister (ADM) Resource Stewardship Report results for water quality sampling (roughly 7,000 sites across the province) indicates that 75% of the sites assessed are considered to have very low to low impact. 20% of sites were assessed as moderate impact. 5% scored in the high and very high impact range. FREP water quality condition data from 2016 to 2021 showed 73% of sites inspected were designated as very low or low impact and 5% were of high impact rating. The remaining 22% of sites inspected were designated as moderate impact. FREP Report #42 provincial water quality impact ratings summary from 2008 to 2020 states that of 8,411 sites evaluated, 27% had a very low water quality impact, and 43% had a low water quality impact. Moderate water quality impact sites was 24%, 5% had a high impact, and 1% had a very high impact. The FPB annual audits and special investigations include evaluating riparian management, and watercourse crossing planning and practices. Within the last five audit periods (2018 to 2023), two significant non-compliances were found related to riparian management, and four significant non-compliances were found related to bridge maintenance.

Private Managed Forest Land

MFC annual inspection reports from 2018 to 2023 found no cases of forest practices not complying with the requirements of the PMFLA or associated Regulations. MFC found landowners were meeting the requirements. Roads built adjacent to streams and active stream crossings were located, built, and used in a manner that protects the stream channel and banks. Road maintenance and deactivation was also found to protect water quality.

Other Private Land

As of March 2024, there is no publicly available results to verify the current condition of water quality/quantity for other private land in BC.

Annex 1 Detailed findings for Supply Base Evaluation

	<p>Risk conclusion and justification</p> <p><u>Crown Land</u> There is a comprehensive legislative framework governing water quality and quantity maintenance on Crown land. The FPPR sets measurable practice requirements. There are operational guidelines and government programs monitor forest management practices. Compliance monitoring of water quality and quantity is completed and verifies conformance. FREP data indicates that current forest management practices are effective in maintaining riparian function and water quality on majority of streams. Based on the evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia.</p> <p><u>Private Managed Forest Land</u> On private managed forest land, federal legislation is comprehensive. Requirements for water are legislated in the PMFLA. MFC annual inspection results verify conformance with the water requirements. Based on the evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia.</p> <p><u>Other Private Land</u> Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of water quality and quantity, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Environmental Protection Act • Canadian Navigable Waters Act • Fisheries Act • Species At Risk Act <p><u>Provincial</u></p>

Annex 1 Detailed findings for Supply Base Evaluation

	<ul style="list-style-type: none"> • 2022 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2017 Managed Forest Inspection Program • ADM Resource Stewardship Report: Regional Results of the Forest and Range Evaluation Program (2019) • Environmental Management Act • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • FPB Annual Report 2022-2023 • FPB Annual Report 2021-2022 • FPB Annual Report 2020-2021 • FPB Annual Report 2019-2020 • FPB Annual Report 2018-2019 • FREP Dashboard • FREP Report # 42. Water Quality Effectiveness Evaluation. Water Quality Data Summary for 2008 – 2020. • MFC Field Practices Guide • Ministry of Forests Compliance and Enforcement Branch Annual Report 2022-2023 • Private Managed Forest Land Act • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013 • Private Managed Forest Land Regulation • Private Managed Forest Land Council Regulation • Riparian Areas Protection Act • Riparian Area Protection Act Regulations • Water Protection Act • Water Sustainability Act • Woodlot License Planning and Practices Regulation (WLPPR) 						
<p><i>Risk rating</i></p>	<table border="0"> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
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Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						

Annex 1 Detailed findings for Supply Base Evaluation

2.2.6	<p>Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.</p>
Findings	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis 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). On Crown land, private managed forest land and other private land in British Columbia (BC), forest operations are legally required to dispose of harvest residue to reduce fire hazards. This could include slash pile burning and/or prescribed burning. Cultural burning, which has been reintroduced in the province, is not discussed in this Indicator. 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. Burning of wood and vegetation is standard industry practice for abating fire hazard and enhancing wildlife habitat, 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:</p> <ul style="list-style-type: none"> • 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, particularly for seniors and breathing compromised patients; • Public complaints related to reduced air quality. <p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Environmental Protection Act <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Environmental Management Act • Environmental Management Act, Waste Discharge Regulation • Environmental Management Act, Open Burning Smoke Control Regulation • Forest Act • Wildfire Act • Wildfire Regulation • Local Government Act <p>Enforcement and monitoring</p> <p><u>Federal</u></p> <p>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</p>

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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 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 Management Act, and Waste Discharge Regulation, implemented by the BC Ministry of Environment and Climate Change Strategy (MECCS), provides the provincial regulatory framework with regards to air emissions. BC has adopted national 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 management strategies such as air quality advisories. Provincial air quality objectives, National Ambient Air Quality Objectives, and Canadian Ambient Air Quality Standards are part of the criteria in the management of air contaminants. Seven air zones are identified in BC as part of the province's commitments under Canadian Air Quality Management System. There are no monitoring stations located in the Northwest air zone and is not reported on. In zones exceeding set contaminant levels, advanced airshed planning provides actions to reduce air pollution levels. The BC Ministry of Forests (FOR) is the agency responsible for ensuring compliance with the Wildfire Act and Wildfire Regulation, which is a provincial-wide requirement in BC. Under the Wildfire Act, a person carrying out industrial activity is required to assess and abate fire hazards through fire hazard assessments, hazard abatement, and follow through with necessary fuel hazard abatement when levels of waste/residue from primary harvest becoming threatening. Under the Forest Act, FOR is responsible for oversight of waste assessments in BC. Forest Residue and Waste Surveying is a process of measuring the volume and quality of standing or felled timber that remains on site upon the completion of primary logging of cut blocks or at the expiry of the cutting permit. Prior to the disposal of slash piles, crown licensees must conduct a waste assessment. The waste assessment must be submitted for review and approval by FOR. Once approved data is transferred into the Harvest Billing System (HBS) for invoicing purposes. As per the Wildfire Regulation, anyone lighting a Category 3 fire must obtain a burn registration number by calling or emailing the BC government and receiving an approval response that includes a burn registration number. The burn registration numbers are logged in the Open Fire Tracking System. The system allows the BC Wildfire Service to track regulated burning across BC, manage firefighting resources and minimize false reports of wildfires. The Open Burning Smoke Control Regulation, under the Environmental Management Act, stipulates where, when, and for how long, burning may be allowed, dependent on the sensitivity zone and ventilation index. The Open Burning Smoke Control Regulation ensures slash burning and prescribed burning is done with minimal risk to human and environmental health. Before burning is conducted, other options should be considered as a "reasonable alternative," such as chipping, mulching, and transporting material to a green-waste recycling facility. FOR published the Chief Forester Forest Management Options for Reducing Slash Pile Burning: Best Management Practices. The goal of the best management practices are to create less waste, reduce greenhouse gas emissions and utilise more fibre through harvesting and silviculture practices that minimise slash pile burning. Under the Local Government Act, regional and municipal governments may also create bylaws which address the air quality impacts of burning within municipal boundaries and would be implemented by the relevant municipal authorities. An inventory of smoke and burning regulations and bylaws is kept and maintained by MECCS.

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Air quality monitoring is conducted by MECCS, Metro Vancouver and industry (where required by permit) in cooperation with ECCC. There are approximately 150 air quality monitoring stations in the province, ranging from permanent monitoring stations in communities, mobile instrumentation and industrial stack monitoring. Monitoring stations measure the presence of contaminants in the air. Air quality data from monitoring systems are validated by MECCS staff. ECCC conducts audits of provincial air quality monitoring stations. Air zone reports are prepared annually by MECCS to summarise how air quality levels in the seven air zones of BC compare to the Canadian Ambient Air Quality Standards over a three-year reporting period. As per the Wildfire Act, FOR is responsible for ensuring that licensees on Crown land, private managed forest land owners, and other private land owners assess wildfire hazard and follow through with necessary fuel hazard abatement when levels of waste/harvest residue from harvesting become threatening. FOR and the Forest Practices Board (FPB) monitor Crown licensees' hazard assessments and hazard abatement through audits and special investigations. Before open burning is conducted in BC, individuals must follow Open Burning Smoke Control Regulation requirements. Any individual in contravention of an open burning prohibition may be issued a violation ticket for \$1,150, required to pay an administrative penalty up to \$10,000, fined up to \$100,000 and/or sentenced to one year in jail. If the contravention causes or contributes to a wildfire, the individual responsible may be ordered to pay all firefighting and associated costs. Regional and municipal governments can take actions of enforcement, such as fines, through municipal bylaws. Depending on the nature of air quality complaints, MECCS or FOR are responsible for the respective legislation and take enforcement actions as necessary, including following up on complaints. For air quality complaints, individuals can report a violation online through the Report All Poachers and Polluters online system or call the 24-hour line. To report a wildfire or open burning violation, individuals should call 1-800-663- 5555.

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 Canadian Council of Ministers of the Environment Canada's Air Website states that 3,239 tonnes of fine particulate matter, representing 1.57% of all fine particulate matter was emitted from prescribed burning and 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. Canada's State of the Forest Annual Reports reported 1,635 wildfires burned 869,255 ha in 2021, 668 wildfires burned 14,534 ha in 2020, and 807 wildfires burned 21,070 ha in 2019. Air Zone Reports published by MECCS found that fine particulate matter levels met Canadian Ambient Air Quality Standards at 49 of 54 monitoring stations in BC, and four of seven BC air zones. The Air Zone Reports excludes wildfire- influenced data from the calculation of air zone management levels. Wildfires are the largest contributor to transboundary flows and exceptional events in BC. MECCS is responsible for environmental compliance reporting. In 2023, it was reported that 117 air emission complaints were received and 94% were responded to within seven days. In 2022, there were 146 complaints received and 97% were responded to within seven days. In 2021, there were 165 air emissions complaints received and 90% were responded to within seven days. The complaints do not distinguish which industry they are related to. Emissions from slash pile burning in BC contribute to approximately 5% of annual greenhouse gas (GHG) emissions, as published in the Provincial Inventory of Greenhouse Gas Emissions. The BC Natural Resources Compliance and Enforcement Database shows two orders and one administrative penalty in 2023, two orders and one administrative penalty in 2022 and five orders in 2021 related to the Wildfire Act. There was one ticket issued to a forestry company in relation to the Open Burning Smoke Control Regulation in 2019. Nine tickets in 2018, and four tickets in 2019 were issued to individuals. Air quality monitoring data is available on the MECCS Air Quality Data webpage.

Risk conclusion and justification

There is a federal and provincial regulatory framework governing levels of air emissions. BC has an Open Burning Regulation applicable at the provincial level. There is ongoing monitoring and public reporting of air emissions. National and provincial results verify air emission thresholds are being met. Some air zones are above the air quality objective

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	<p>limits, but forest industry practices are not identified as the cause, and are operating within industry best practices. Based on evidence reviewed, this Indicator is designated as low risk for Crown land, private managed forest land, and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> ● 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 ● Supplier verification program ● Interviews with regulatory/oversight agency ● Interview with experts ● Interview with suppliers
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> ● Canadian Council of Ministers of the Environment Canada's Air Website ● Canadian Environmental Protection Act ● Federal Air Quality Health Index ● National Air Pollution Surveillance Program ● The State of Canada's Forests Annual Report (2022) ● The State of Canada's Forests Annual Report (2021) ● The State of Canada's Forests Annual Report (2020) <p><u>Provincial</u></p> <ul style="list-style-type: none"> ● Air Quality Health Index ● BC Ambient Air Quality Objectives Fact Sheet ● Burn Registration ● Chief Forester Forest Management Options for Reducing Slash Pile Burning: Best Management Practices ● Contact B.C. Air Quality Regarding Air Quality Complaints ● Environmental Compliance Reports Air Quality Data ● Environmental Management Act ● Environmental Management Act, Waste Discharge Regulation ● Environmental Management Act, Open Burning Smoke Control Regulation ● Forest Act

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	<ul style="list-style-type: none"> • Local Government Act • Open Burning Smoke Control Regulation • MECCS Air Zone Reports • MECCS Measuring Air Quality. • MECCS Smoke and Burning Regulations and Bylaws. • Natural Resource Compliance and Enforcement Database • OFTS Registered Burns and Prescribed Fire Map • Provincial Inventory of Greenhouse Gas Emissions • Wildfire Act • Wildfire Regulation • Wildfire Risk Reduction Pile Construction and Burning Guidance 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
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Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
2.2.7	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.						
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis 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.</p> <p>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.</p>						

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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

- Integrated Pest Management Act
- Integrated Pest Management Regulation
- Weed Control Act
- Weed Control Regulation

Crown Land

- Forest and Range Practices Regulation
- Forest and Range Practices Act – Invasive Plants Regulation

Enforcement and monitoring

Crown Land, Private Managed Forest Land, and Other 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 British Columbia (BC). 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 BC Ministry of Environment and Climate Change Strategy (MECCS) has authority to administer pesticide use and Integrated Pest Management. These practices are described and regulated under the Integrated Pest Management Act and Weed Control Act. Pesticides are primarily used to control vegetation, weeds, and invasive species. The identification of invasive plants falls under the Forest and Range Practices Act (FRPA) Invasive Plants Regulation. These Acts and Regulation apply to pesticide use on crown land, private managed forest land, and other private land. Using a pesticide for forest pest management requires a pesticide use notice confirmation, a pesticide user licence and/or a permit, and pesticide applicator certification. A Pest Management Plan must be prepared, a pesticide use notice submitted, and confirmation of receipt from MECCS for the use of pesticides for the management of forests pests on more than 20 ha per year of public land. Pesticide applicators are certified to manage weeds, insects, and diseases in forestry production. MECCS provides a list of independent, certified trainers or approved invigilators.

Crown Land, Private Managed Forest Land, and Other Private Land

Federally, the Pest Management Regulatory Agency has oversight for the registration and approval of chemicals for intended use. Provincially, pesticide use is authorised and managed by MECCS. Provincial inspectors conduct inspections to ensure compliance with Integrated Pest Management Act and Regulation requirements. The Conservation Officer Service can also conduct inspections. Inspections can be part of routine business, or can be due to a complaint or incident. If non-compliance is found during inspection, advisories or warnings, referrals for orders, administrative monetary penalties and administrative sanctions can be issued or a referral for investigations by provincial enforcement staff. Violation tickets, court convictions, and restorative justice are enforced. Concerns of misuse

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	<p>of pesticides can be reported to a conservation hotline.</p> <p><u>Crown Land, Private Managed Forest Land, and Other Private Land</u></p> <p>The Stockholm Convention (2019) identifies 16 pesticides, 13 industrial chemicals, three chemicals categorised as both a pesticide and industrial chemical and seven 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 one chemical in both the pesticide and industrial chemical categories, which have been banned or severely restricted for health or environmental reasons. The Pesticide Action Network International Consolidated List Of Banned Pesticides identifies banned pesticides by country on an annual basis. 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 BC. MECCS is responsible for environmental compliance reports. In the 2023 compliance summary, there were 96 pesticides complaints received by MECCS, and two pest management administrative penalties enforced. In the 2022 compliance summary, there were 117 pesticides complaints received by MECCS and 1% of the total administrative penalties were enforced for pest management. In the 2021 compliance summary, there were 245 inspections conducted, and 139 complaints received by MECCS. In the 2019 Integrated Pest Management compliance inspection report, 311 inspections were conducted by MECCS and 120 resulted in a notice of compliance, 148 resulted in an advisory, 39 resulted in a warning, and three resulted in an administrative penalty. In 2019, a total of 181 pesticides complaints were received by MECCS. In the 2018 Integrated Pest Management compliance inspection report, 254 inspections were conducted by MECCS resulted in 117 notice of compliances, 116 advisories, 19 warnings, and two administrative penalties. In 2018, a total of 115 pesticide complaints. Results are published in the BC government’s Natural Resource Compliance and Enforcement Database and in the reports, publications, and guides for pesticides section of the government’s pesticides and pest management website. The most recent report (2019), Integrated Pest Management Act Forestry Pesticide User Audit conducted by MECCS, indicates 21 inspections were completed. The audit found an overall compliance rate of 86%. The non- compliances found were mainly administrative. There was 100% compliance rate for 18 field and desk audit inspections. Thirty-two cutblocks were inspected with sensitive aquatic features that received aerial application of pesticides.</p> <p>Risk conclusion and justification</p> <p>Only chemicals registered by the federal government may be used in BC. The sale, use, and application of pesticides is regulated in BC with a regulatory framework in place for crown land, private managed forest land, and other private land. Training and certification requirements are in place for applicators (regardless of ownership type) to ensure a minimum level of competency prior to using and applying pesticides. There is publicly available information to ensure that MECCS are monitoring herbicide use for compliance and using enforcement as necessary. 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, private managed forest land, and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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

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	<ul style="list-style-type: none"> • 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 						
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • All POPs listed in the Stockholm Convention • Pesticide Action Network International Consolidated List Of Banned Pesticides • Rotterdam Convention Annex III Chemicals <p><u>Federal</u></p> <ul style="list-style-type: none"> • Pest Control Products Act • Pest Control Products Incident Reporting Regulations • Pest Control Products Regulations • Pest Control Products Sales information Reporting Regulations • Public Registry of Pest Control Products for Use in Canada <p><u>Provincial</u></p> <ul style="list-style-type: none"> • 2019 Integrated Pest Management Compliance Inspection Report • 2018 Integrated Pest Management Compliance Inspection Report • Forest and Range Practices Act • Forest Protection and Practices Regulation • Integrated Pest Management Act • Integrated Pest Management Regulation • Invasive Plants Regulation • MECCS Environmental Compliance Reports (2021 – 2023) • FOR – Pesticide Certification and Training • FOR – Forestry Pesticide Applicator Certificate • Weed Control Act • Weed Control Regulation 						
<p><i>Risk rating</i></p>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
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2.2.8	<p>Waste shall be disposed of in an environmentally appropriate manner.</p>
Findings	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis The European Union defines waste as “any substance or object that the holder discards or intends to discard or is required to be discarded.” 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:</p> <ul style="list-style-type: none"> • 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. <p>Indicator 2.2.4 Residue Removal Minimises Neg Impact to Ecosystem 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 and Pest Management Comply with Laws for pesticide use.</p> <p>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.</p> <p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Environmental Protection Act • Hazardous Products Act and its Regulations <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Environmental Management Act • Environmental Management Act, Hazardous Waste Regulation • Environmental Management Act, Spill Reporting Regulation • Environmental Management Act, Spilled Preparedness, Response and Recovery Regulation • Environmental Management Act, Spill Contingency Planning Regulation • Environmental Management Act, Recycling Regulation • Environmental Management Act, Waste Discharge Regulation • Integrated Pest Management Act • Occupational Health and Safety Act

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- Occupational Health and Safety Act, Occupational Health and Safety Regulation (Part 5, Chemical Agents and Biological Agents)
- Local 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 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 labeled 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

WHMIS requirements in British Columbia (BC) are outlined under the Occupational Health and Safety Regulation, WHMIS requirements, under the jurisdiction of WorkSafeBC. WorkSafeBC prevention officers have also been designated as federal WHMIS officers to enforce the federal WHMIS requirements (Hazardous Product Act and associated Regulations). BC Ministry of Environment and Climate Change Strategy (MECCS) has authority to administer the Environmental Management Act. The Hazardous Waste Regulation addresses the appropriate handling and disposal of hazardous materials under the Environmental Management Act. Spill Management Regulations (Spill Reporting Regulation, Spill Preparedness, Response and Recovery Regulation, and Spill Contingency Planning Regulation) are under the Environmental Management Act. The regulatory requirements define spill contingency planning, spill reporting requirements, spill response actions, mandate persons to prepare and test spill contingency plans and exercises in a three year cycle, and mandatory post-spill reporting. A spill must be reported immediately if the quantity of the spill is equal to or greater than the amount identified in the schedule of the Spill Reporting Regulation for the substance, and/or the spill has impacted, or may impact a body of water. The Recycling Regulation details items that can be recycled. The Spill Reporting Regulation outlines what is provincially considered a reportable spill and must be immediately reported to the Provincial Emergency Program. Spills can be reported to 1-800-663-3456. The Waste Discharge Regulation defines what activities and types of waste need to be authorised under the Environmental Management Act, which includes air contaminants, garbage and hazardous wastes. MECCS is responsible for the Integrated Pest Management Act which details proper disposal of pesticides in BC. Reports on spills and waste can be made via the Report All Poachers and Polluters online system, phone, or contact through the nearest Conservation Officer Service office.

Crown Land

Additionally, Crown licensees and contractors operating on Crown land in BC maintain management systems that include procedures for managing waste and spills. Crown licensees include requirements, either in contracts or prework documents that specify appropriate waste management practices. Crown licensees 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. The forest industry also has a duty to self-report and to implement remediation procedures.

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Private Managed Forest Land

On private managed forest land, the owner is responsible to remain compliant with provincial regulatory waste requirements. As of January 2024, there is no publicly available information regarding implementation mechanisms for waste disposal.

Other Private Land

Additionally, the Local Government Act provides local governments the ability to approve bylaws in a local municipality. On other 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

WorkSafeBC has oversight of the provincial WHMIS Regulation. WorkSafe BC officers conduct inspections of worksites and can take enforcement measures if necessary. BC's environmental compliance model uses a consistent, risk-based approach to ensuring compliance. MECCS provincial inspectors verify compliance with the Environmental Management Act and Integrated Pest Management Act. Inspections ensure requirements are being followed to protect the environment and human health.

The Environmental Management Act provides enforcement options for MECCS, including administrative penalties, orders, and fines. The Integrated Environmental Enforcement Unit, a partnership between the MECCS environmental protection division and Ministry of Forests (FOR) conservation officer service, investigates complex environmental offences and pursues both prosecution and administrative enforcement responses.

Crown Land

Additionally, the BC Natural Resource Compliance and Enforcement Database is a searchable web application which contains compliance and enforcement actions issued by natural resource agencies.

Private Managed Forest Land

Beyond the MECCS and WorkSafeBC monitoring, there is no additional oversight or monitoring of operations on private managed forest land regarding waste disposal. Landowners are responsible for the oversight of operations.

Other Private Land

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

Provincial

Environmental Reporting BC publishes annual compliance inspection summaries, which cover the calendar year for the Environmental Management Act and Integrated Pest Management Act activities. In 2022, there were 912 inspections completed by 25 inspectors. 270 notices of compliance, 370 advisories, 221 warnings, 50 administrative penalties and 1 investigation referral was reported for compliance responses. In 2021, 932 inspections were conducted by 18 inspectors on Environmental Management Act. In 2022, the Integrated Environmental Enforcement Unit conducted six investigations; four active and two completed and one completed administrative penalty. Spill incidents are publicly available on the MECCS website. Sources include, but are not limited to, vehicles, ships, storage tanks, and private property. There was one spill incident action related to a pulp mill closure in 2019. There are no other spill incidents related to forest operations from 2018 to 2023. Compliance reports, audits and administrative penalties issued under the Environmental Management Act and Integrated Pest Management Act are on the BC government's Environmental Compliance Reports page. Penalties are publicly available in the Natural Resources Compliance and Enforcement Database.

Risk conclusion and justification

Crown Land

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	<p>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 British Columbia.</p> <p><u>Private Managed Forest Land and Other Private Land</u></p> <p>The Natural Resource Compliance and Enforcement Database has all contraventions to MECCS-related legislation. MECCS contraventions are publicly available. Publicly available spill incident information indicates private properties are included in reporting requirements. 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 private managed forest land and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • European Commission – Commission notice on technical guidance on the classification of waste <p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Environmental Protection Act • Hazardous Products Act and its Regulations • Workplace Hazardous Materials Information System 2015<u>Provincial</u> • BC Report a Spill Website • BC Spill Incidents Website • Environmental Management Act • Environment Management Act: Hazardous Waste Regulation • Environment Management Act: Spill Reporting Regulation

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	<ul style="list-style-type: none"> • Environment Management Act: Spill Preparedness, Response and Recovery Regulation • Environment Management Act: Spill Contingency Planning Regulation • Local Government Act • MECCS Compliance and Enforcement Policy and Procedure • MECCS Environmental Compliance Reports • Natural Resource Compliance and Enforcement Database • Occupational Health and Safety Regulation Part 5: Chemical Agents and Biological Agents • Spills & Environmental Emergencies Website 						
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Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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 allowable annual 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 British Columbia (BC) 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. This fibre can contribute to other manufactured forest products through BC Ministry of Forests (FOR) Residual Fibre Utilization Program. The intent of this initiative is to encourage greater use of roadside slash by the biomass industry (i.e., increased fibre utilisation). (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.</p> <p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest Act, Cut Control Regulation 						

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- Forest Act, Allowable Annual Cut Administration Regulation
- Forest Act, Allowable Annual Cut Partition Regulation Private Managed Forest Land
- Private Managed Forest Land Act (PMFLA)
- Private Managed Forest Land Council Regulation

Other Private Land

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

Enforcement and monitoring

Crown Land

The BC Ministry of Forests (FOR) has authority to administer the Forest Act and its Regulations which provides the regulatory framework to enable the determination of long-term sustainable harvest levels on Crown land. On Crown land, under the Forest Act FOR makes a determination of the AAC for the province's Timber Supply Areas, Tree Farm Licences (TFLs), Community Forest Agreements, First Nations Woodland Licences, and Woodlot Licenses. Crown land AACs are determined through the Timber Supply Review process, which is a rigorous process of data collection and analysis, re-analysis, and consultation. The Forest Act describes the information that must be considered in the AAC determination to ensure long-term environmental sustainability and economic viability. To determine AAC, FOR follows direction provided in the Allowable Annual Cut Administration Regulation, the Allowable Annual Cut Partition Regulation using forest inventory data provided by FOR's Forest Inventory Program.

Minor levels of damage and losses from natural disturbances are accounted for in the Timber Supply Reviews. Significant level of damage and losses from these natural disturbances can result in an AAC reduction. The AAC impact is not recognised until the Chief Forester has completed an AAC determination. Damaged or killed timber can be salvaged if it is accessible and has sufficient quality to be made into a product. Salvage harvests do not count against the AAC in BC.

Private Managed Forest Land

The Managed Forest Council (MFC) administers the Private Managed Forest Land Program under the Private Managed Forest Land Act (PMFLA). The PMFLA is the regulatory framework for setting forest management goals on private managed forest land. One goal of the Program is to manage lands for long-term forest production, although the Act does not reference long-term sustainable harvest level. A key management objective requires the successful regeneration of areas where timber is harvested or destroyed and minimisation of disturbed area. The PMFLA Council Regulation requires harvested areas be regenerated promptly with a healthy, commercially valuable stand of trees.

Other Private Land

Individually, other private land is too small to support a long-term sustainable harvest level. 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. Actual harvest level from other private land is the result of the decisions of individual land owners. Historically, actual harvest levels from other private land is variable, usually rising as the market price for timber increases and declining when it falls.

Crown Land

FOR is responsible for AAC determination and oversight on Crown land. For management units on Crown land, actual harvest levels are tracked against the AAC through the requirements of the Forest Act and Cut Control Regulation. The Regulation requires each timber licence holder harvest levels be tracked, ensuring harvest levels are at or below the AAC. Penalties may be applied if there is an overcut, and the excess volume harvest is charged against the next cut control period. Undercut is not allowed to be carried forward into the next period.

Private Managed Forest Land

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MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including harvesting and reforestation. MFC conducts annual inspections, with a 10% inspection target of all private managed forest lands each year. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting and reforestation activities. FOR may request to conduct a formal audit on the private managed forest land program.

Other Private Land

As of March 2024, there is no publicly available information describing an oversight framework for long-term sustainable harvest levels on other private land.

Crown Land

As of January 2024, historic and/or current summary data for the provincial-level AAC is not publicly available. FOR data to October 2023 verified the regulated crown land AAC was 62.3 million m³. This volume represents the sum of AACs on Crown Timber Supply Areas, TFLs, First Nations Woodland Licences, Community Forest Agreements, and Woodlot Licences. On Crown land, detailed and current timber supply forecasts and related assumptions are publicly available for crown land tenures on FOR website. Crown land AAC has been declining due to losses from the mountain pine beetle outbreaks in the 1990s, as well as recent wildfires. The impacts of the wildfires from 2017, 2018, 2021 are assessed on timber supply for the areas affected. FOR reported in 2022 that the impacts of wildfire from 2016 to 2021 have been accounted for in some Timber Supply Reviews (e.g., Okanagan and Lakes Timber Supply Area) and will be accounted for in Timber Supply Reviews underway on other Timber Supply Areas. As of April 2024, the effects of the 2023 wildfires have not been incorporated into the AAC for any of the affected areas. While actual salvage harvest volume is not readily available, FOR has issued salvage permits for 1.4 million m³ of wood in response to the 2023 wildfires. The 2022 Economic State of British Columbia's Forest Sector report produced by FOR shows that the overall provincial harvest dropped in 2019, and has declined further since. The 2022 data shows Crown harvest of 40 million m³ is roughly 65% of the October 2023 reported AAC. The Crown land harvest represents 84% of the total provincial harvest.

Private Land and Federal Land

The 2022 Economic State of British Columbia's Forest Sector reported the private (which includes both private managed forest land and other private land) and federal land total harvest volume was 7.6 million m³ in 2022, representing 16% of the total provincial harvest.

Private Managed Forest Land

Additionally, the MFC 2022/2023 Annual Report documents 4.0 million m³ was harvested from private managed forest land in 2022, representing 8.4% of the total provincial harvest that year. The MFC has reported a compliance rate of 99% on private managed forest land since its audit program commenced in 2007.

Other Private Land

Based on the figures above, it is estimated that approximately 3.6 million m³ (7.6%) of timber harvest originates from other private land and federal land.

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. FOR sets long-term sustainable harvest levels. FOR monitors actual harvest levels. FOR 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 British Columbia.

Private Managed Forest Land

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	<p>On private managed forest land, Regulations and an associated reporting and monitoring system is in place. While the long-term sustainable harvest level on private managed forest land is not publicly available, the compliance rate for re-planting harvested and disturbed areas is high. Based on evidence reviewed, this Indicator is designated as low risk on private managed forest land in British Columbia.</p> <p><u>Other 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. As such, this Indicator is designated as specified risk for other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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 • Timber supply analysis, applicable to the supply base area • AAC vs actual harvest analysis, 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
<p><i>Evidence reviewed</i></p>	<p>Provincial</p> <ul style="list-style-type: none"> • Allowable Annual Cut – Timber Supply Areas • Allowable Annual Cut – Tree Farm Licences • BC Ministry of Forests. 2022 Economic State of British Columbia's Forest Sector • Forest Act • Forest Act, Allowable Annual Cut Administration Regulation • Forest Act, Allowable Annual Cut Partition Regulation • Forest Act, Cut Control Regulation • Managed Forest Council Annual Report 2022-23 • Ministry of Forests Trends in Timber Harvest in BC • National Forestry Database • Private Managed Forest Land Act

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	<ul style="list-style-type: none"> • Private Managed Forest Land Council Regulation • The State of British Columbia's Forests – Third Edition 2010 • Timber Supply Review & Allowable Annual Cut • Timber Supply Review Backgrounder April 2021 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						
2.2.10	Harvested areas shall be regenerated.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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. See Indicator 2.2.12 Genetically Modified Trees not Used.</p> <p>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.</p> <p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act • Forest Planning and Practices Regulation <p><u>Private Managed Forest Land</u></p> <ul style="list-style-type: none"> • Private Managed Forest Land Act • Private Managed Forest Land Regulation <p><u>Other Private Land</u></p> <p>There is no regulatory framework that requires regeneration after timber harvest on other private land.</p> <p>Enforcement and monitoring</p>						

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Crown Land

On Crown land, the British Columbia (BC) Ministry of Forests (FOR) has authority to administer the Forest and Range Practices Act (FRPA) which provides the regulatory framework for reforestation. FRPA requires that reforestation occurs after harvesting to maintain or enhance an economically valuable supply of commercial timber from BC forests. Timber is one of 11 resource values required to be managed and protected under FRPA. Licensees are legally required to reforest harvested areas. The Forest Planning and Practices Regulation (FPPR) requires licensees to prepare Forest Stewardship Plans (FSPs) to address FRPA's objectives. FSPs have approved stocking standards that harvested areas must meet. The standards are identified in the silviculture plans and prescriptions in individual cutblock site plans.

Private Managed Forest Land

The objective to promptly regenerate harvested areas with a healthy and commercially valuable stand of trees on private managed forest land is one of five key managed objectives as described in the Private Managed Forest Land Act (PMFLA). The Managed Forest Council's (MFC's) Field Practices Guide aids private managed forest land owners in field decisions and practices to meet regulation requirements. Guidance includes legislated timeline requirements, best management practices, and forest management strategies to achieve successful regeneration.

Other Private Land

As of March 2024, there is no publicly available information describing implementation mechanisms for regeneration on other private land.

Crown Land

The Reporting Silviculture Updates and Land Status Tracking System (RESULTS) manages the submission of openings, disturbances, silviculture activities, and obligation declarations as required by the Forest and Range Practices Act (FRPA). Licensees are required to submit annual declaration data. The Forest Stewardship Plan Tracking System allows forest licensees, BC Timber Sales, and FOR to electronically manage FSP submissions. Through the Jasper Corporate Reporting System, stocking standards reports are available to view if associated with FSPs. FOR reviews and approves regeneration delay surveys submitted by Crown licensees. FOR Compliance and Enforcement Branch (CEB) periodically conducts inspections of active worksites to ensure FRPA objectives are met. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The Forest and Range Evaluation Program (FREP) measures the effectiveness of forest and range practices, including regeneration, by monitoring and evaluating the condition of eleven resource values. The Forest Practices Board (FPB) audits and conducts special investigations to evaluate regeneration planning and practices.

Private Managed Forest Land

MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including regeneration. MFC conducts annual inspections, with a 10% inspection target of all private managed forest lands each year. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting, destroyed timber, road construction and deactivation, and reforestation activities. FOR may request to conduct a formal audit on the private managed forest land program.

Other Private Land

On other 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 other private land.

Crown Land

Silviculture data received by FOR is stored in the RESULTS application. Data stored in the RESULTS application are accessible through the National Forestry Database, Environmental Reporting BC, Jasper Corporate Reporting System and the British Columbia Geographic Warehouse. The FPB 2022/2023 annual report indicates of the 11 published audit reports, there were 55 samples within the audit scope. One significant non-compliance was found related to free-growing status

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	<p>of a stand. No non-compliances were found related to regeneration in the 2020/2021 or 2019/2020 reports. There was one regeneration obligation non-compliance of 122 samples and two free growing non-compliances of 225 samples in 2018/2019. The Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report reports the target average planting regeneration delay is less than two years and the current condition on harvested areas is 22 months.</p> <p><u>Private Managed Forest Land</u></p> <p>The last formal MFC audit of the private managed forest land program required was conducted in 2013. MFC published a report titled: Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the Private Managed Forest Land Act. The audit was carried out by a multidisciplinary team, including foresters, a geoscientist, and a biologist, who sampled approximately 1/3 of the managed forests in the program. The 2013 Audit found that the reforestation objective is being achieved through the MFC regulation and private managed forest land landowner practices. More recent data is available in the 2023 MFC Annual Report. The 2023 report indicates that 50 private managed forest lands (roughly 18% of forests in the program) were inspected, and one potential issue was found with reforestation. One issue was found with reforestation in 2022. The 2021 inspection found four potential restocking non-compliance issues, where silviculture surveys has been initiated and follow-up action was to be determined. The 2018 and 2019 inspections found no restocking non-compliance issues. In 2017, two owners were identified as having potential restocking issues on private managed forest land.</p> <p><u>Other Private Land</u></p> <p>As of March 2024, there are no publicly available results to verify the current condition of regeneration for other private land.</p> <p>Risk conclusion and justification</p> <p><u>Crown Land</u></p> <p>There is a comprehensive regulatory framework governing regeneration on Crown land. Stocking standards, and annual declarations provide evidence that licensees are complying with regeneration legislation. Government programs and independent auditing boards monitoring forest management practices and provide recommendations for improvement. Inspection and audit results verify compliance with practice requirements related to regeneration. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia.</p> <p><u>Private Managed Forest Land</u></p> <p>Audits and inspection reports completed by the MFC verify landowners are complying with reforestation requirements. Based on the evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia.</p> <p><u>Other 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 regeneration following timber harvesting, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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

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	<ul style="list-style-type: none"> • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Regeneration 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
<p><i>Evidence reviewed</i></p>	<p>Provincial</p> <ul style="list-style-type: none"> • 2023 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2017 Managed Forest Inspection Program • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • FPB Annual Report 2022-2023 • FPB Annual Report 2021-2022 • FPB Annual Report 2020-2021 • FPB Annual Report 2019-2020 • FPB Annual Report 2018-2019 • FOR – Integrated Resource Monitoring • FOR Silviculture statistics • FREP Dashboard • Private Managed Forest Land Act • Private Managed Forest Land Council Regulation • Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013 • Woodlot License Planning and Practices Regulation

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<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.						
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis 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 more temporary forest loss than timber harvesting. Aspects of natural disturbance as related to sustaining healthy and vital ecosystem services is addressed in Indicator 2.2.2 – Health, Vitality & 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"> • Loss or long-term alteration of forest ecosystems; • Reduction of productive forest area; • Reduction in forest growth rate; • Loss of socio-economic benefits from forests; • Property losses; and • Danger to human lives. <p><u>Federal</u></p> <ul style="list-style-type: none"> • Pest Control Products Act • Pest Control Products Regulations • Plant Protection Act <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Integrated Pest Management Act • Wildfire Act • Wildfire Regulation 						

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Crown Land

- Forest Act
- Forest and Range Practices Act
- Forest Planning and Practices Regulation

Private Managed Forest Land

- Private Managed Forest Land Act
- Private Managed Forest Land Act Regulation

Enforcement and monitoring

The federal Acts are implemented through provincial forest ministries and forest legislation. In British Columbia (BC), the Forests Act allows Ministry of Forests (FOR) to intervene on Crown land, private managed forest land, and other private land to manage natural disturbance events in forests. The Wildfire Act allows FOR, through the BC Wildfire Service, to issue fire permits and control wildfires and fire hazards. Crown land licensees must provide Forest Stewardship Plans (FSPs) that consider protection from fire, insects, and disease and description of techniques used. FOR may require the holder of a FSP, woodlot licence plan, or other operational plan to submit proposals and be responsible for forest health issues. In extreme conditions the Lieutenant Governor in Council may designate areas a forest health emergency management area and allow FOR to undertake remedial actions. On both private managed forest land and other private lands, FOR may require a private landowner to control or dispose of timber or timber products that are infested with insects, disease, windthrow or other abiotic factors. FOR inventories and monitors forest health (including natural disturbances) annually with aerial and ground surveys to confirm tree disease type that cannot be done aurally. Annual aerial coverage ranges from 70-80% of provincial forests, including Crown land, private managed forest land, and other private land. Statistics are reported provincially.

Pests and Diseases

The federal Pest Control Products Act and Pest Control Product Regulations and the provincial Integrated Pest Management Act apply to Crown land, privately managed forest land, and other forest land. FOR conducts strategic and tactical planning related to pests and disease based on the 2023-2026 Provincial Forest Health Strategic Plan delivered through timber supply areas, regional and district strategic and tactical plans. The Strategic Plan's main priorities are:

- Pest impacts are monitored and assessed;
- Practices are adapted to accommodate known forest health risks; and
- Forest resources are protected from pest damage through appropriately applied direct management actions.

On Crown land, all timber supply areas have regional forest health strategies based on the priority forest health issues in that area.

On Crown land, private managed forest land, and other private land, forest managers/owners are required to address implementation of FPPR forest health requirements through:

- Expediting harvest plan approvals where they are required to kill bark beetle brood before the next flight;
- Requiring prompt disposal of slash;
- Treating baited trees or trap trees promptly; and
- Delaying green up for up to 20 years to account for forest health concerns in particular root disease.

On Crown land, private managed forest land, and other private land, FOR periodically conducts spraying programs implemented with a pest management plan under the Integrated Pest Management Act regulation. On Crown, private managed forest land, and other private land, natural disturbances are assessed annually

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in the aerial survey program and reported in the annual Summary of Forest Health Conditions in British Columbia.

Wildfire

The Wildfire Act and Wildfire Regulation, along with fuel hazard assessment and abatement requirements apply to Crown land, private managed forest land, and other private lands. The legislation is implemented through FOR's BC Wildfire Services Prevention Program which is aimed at reducing the negative impacts of wildfire on public safety, property, the environment, and the economy. On Crown land, licensees are required to implement fire prevention plans consistent with FRPA regulations in the FSP.

Windthrow

On Crown land, private managed forest land and other private land provincial annual aerial surveys identify significant windthrow events with annual monitoring. On Crown land, windthrow effects are assessed and implemented at the landscape and stand level after significant events under the Forests Act. Windthrow salvage planning is implemented in the FSPs. On private managed forest land and other private land, there are no regulatory requirements for windthrow management.

Pests and Diseases

On Crown land, private managed forest land, and other private land, forest health outbreaks are inventoried and monitored by FOR using aerial surveys. Direct management actions are employed when the size and severity of an outbreak or major infestation warrants a response. This is determined using a hazard and risk rating system. On Crown land, private managed forest land, and other private land, FOR has oversight on spraying programs with an implemented integrated pest management plan. On Crown land, all Timber Supply Areas have regional forest health strategies based on the priority forest health issues in that area.

On Crown land, forest health practices are stipulated in FSPs approved by FOR and are also subject to public review. On private managed forest land and other private land most forest health activities are non-obligatory (non-legal) and are carried out through mutual agreement by licensees, landowners and government through the recommendations of professionals. Risk analysis is not conducted on private managed forest land and other private land, but aerial surveys cover all forests. On private managed forest land annual and 5-year licensee harvest plan reviews provide oversight on pest and disease measure implementation. On other private land, oversight is the responsibility of municipal government, no operational plans are required to be reviewed for pests and disease treatment.

Wildfire

On Crown land, private managed forest land and other private land, FOR has oversight on the Wildfire Act and wildfire elements of the Forest Act and FRPA. FOR manages wildland fire to mitigate negative impacts on communities, critical infrastructure, and natural resources. Fire detection is undertaken by fire wardens, aerial reconnaissance, and the use of infrared technology and computer modelling to assess fire risk and expected fire locations. The provincial fire unit responds when fires are detected. On Crown, private land and other private land, the FOR BC Wildfire Services, Union of BC Municipalities Community Resiliency Investment (CRI) Program, and the Forest Enhancement Society of BC, identify, map, and provide tactical plans for reducing wildfire threats adjacent to communities in the Wildland Urban Interface. Collaboration occurs between agencies responsible for community and resource protection including FOR, BC Wildfire Services, and local governments.

Forest operations on Crown land are required to have fire suppression equipment on site, and are shut down during periods of high fire risk. On Crown land, FOR report Fire Management Stocking Standard Guidance assists in guiding the development of FSP stocking standards when harvesting occurs near communities. In addition, FOR provided guidance on site-level forest harvesting in recently burned forest stands in the Post-Natural Disturbance Forest Retention Guidance document. The Forest Practices Board has a companion technical bulletin entitled Landscape Forest Management. Current initiatives in Forest Landscape Plan Pilots are focusing on implementing this proactive guidance. On private managed forest land, the PMFLA Regulations require that landowners evaluate fire risks in site plans. A sub-sample of land owners are audited annually, but there is no comprehensive assessment of these risks at a landscape level. Managed Forest Council

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produces annual reports that summarise the results of audits—a review of recent reports found that the inspections identified issues related to fire damage. Other private land is subject to regional district and municipality regulations relevant to land clearing and development. These regulations vary by district, but in general focus more on land clearing and development than on risks to forest health from natural disturbances.

Windthrow

On Crown, private land and other private land, windthrow is assessed annually in the aerial survey program and reported in the annual Summary of Forest Health Conditions in British Columbia. Significant areas are reported to Crown licensees and private landowners to facilitate salvage.

Results are at the provincial level. There is no publicly available reporting that breaks down data by Crown land, private managed forest land, and other private land.

Pests and Diseases

The dominant pest and disease disturbances in BC forests is insects (mainly mountain pine beetle (MPB)). MPB peaked provincially in 2012 with 53% of merchantable pine killed. By 2020, the outbreak was essentially over, having killed over 18 million ha. In the three-year period 2020-2022, provincial insect damage ranged from 5.2 million ha (2021) to 2.9 million ha (2022). Disease ranged from 160 thousand ha (2020) to 27 thousand ha (2022). In the BC interior, Douglas-fir and spruce are now being threatened by large outbreaks of Douglas-fir and spruce beetles, respectively. In the three-year period 2020-2022, Douglas-fir beetle damage ranged from 106 thousand ha (2021) to 45 thousand ha (2022), and for Spruce beetle ranged from 525 thousand ha (2020) to 144 thousand ha (2022). FOR conducted bacillus thuringiensis kurstaki spray programs for hemlock looper, western spruce budworm, and Douglas-fir tussock moth in some coastal and interior regions in 2021 and 2023. The 2021 programs was small blocks and the 2023 program was proposed to be as much as 40,000 ha.

Wildfire

In 2017, 2018, and 2021, BC experienced its three largest wildfire seasons in recorded fire history affecting 3.4 million ha. The ten-year average (2012-22) was 1,483 fires, 42% human and 58% lightning origin. The fire area average was 407 thousand ha and peaked in 2017 and 2018 at 1.2 million and 1.3 million ha, respectively. In the 2020-2022 period, fire and post-fire damage ranged from 878 thousand ha to 104 thousand ha.

Windthrow

Windthrow effects in BC are at the stand level and related to geographic exposure and sporadic climatic events. In the 2020-2022 period, windthrow damage ranged from 12.6 thousand ha (2021) to 0.8 thousand ha (2022).

Risk conclusion and justification

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, private managed forest land and other private land in British Columbia.

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

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	<ul style="list-style-type: none">• Fibre procurement policy & procedures• Regulatory compliance and enforcement data/reports• Oversight agency database records and/or reports• 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
<i>Evidence reviewed</i>	<p><u>Federal</u></p> <ul style="list-style-type: none">• Pest Control Products Act• Pest Control Products Regulations• Plant Protection Act <p><u>Provincial</u></p> <ul style="list-style-type: none">• 2022 Summary of Forest Health Conditions in BC• 2023-2026 Forest Health Strategic Plan• Chief forester stocking guidelines• Forest Act• Forest and Range Practices Act• Forest Health Strategies• Forest Landscape plans• Forest Planning and Practices Regulation• Forest Practices Board 2020/2021 Annual Report• FPB Annual Report 2018-2019• FPB LFM Tech Bull SR61• Integrated Pest Management Act• Post natural disturbance retention guideline• Private Managed Forest Land Act• Regional forest health strategies• The 1999-2015 mountain pine beetle outbreak• The State of British Columbia's Forests – Third Edition 2010• Wildfire Act• Wildfire History• Wildfire Management Website

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	<ul style="list-style-type: none"> • Wildfire Regulation 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
2.2.12	Genetically modified trees shall not be used.						
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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 that code for traits which would not be obtained easily through conventional selective breeding.</p> <p>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.</p> <p>The relevant federal and provincial legislation concerning the use of GMOs in forestry includes the following Acts and associated regulations.</p> <p><u>Federal</u></p> <ul style="list-style-type: none"> • Plant Protection Act • Seeds Act <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forest and Range Practices Act <p>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 commercialisation. This protocol requires confined field trials to demonstrate safety. In British Columbia (BC), the Forests and Range Practices Act (FRPA) determines public policy for forest regeneration, but it does not specifically reference the use of genetically modified seedlings in forest regeneration. However, the FRPA does require registration of seed including, without limitation, determination of genetic quality and imposition of conditions on the use of registered seed. FRPA Section 169</p>						

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	<p>permits the Chief Forester to establish standards regarding tree gene resources. The Chief Foresters Standards for Seed Use stipulates the prohibition of registration of seeds or vegetative material that has been subject to genetic modification through mutagenesis, recombinant DNA, or other related methods. The Ministry of Forests (FOR), Forest Improvement and Research Management Branch is the agency responsible to understand, protect, and conserve the gene foundations of BC's public forests.</p> <p>The Canadian Food Inspection Agency oversight of plants with a novel traits covers both the unconfined environmental release of such plants and enforcement of unauthorised release. The Canadian Food Inspection Agency conducts 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 BC FOR provides oversight on seed production, breeding and usage through compliance and enforcement of the FRPA. The Act and regulations govern how and where seed is deployed within the province. BC manages 40 seed orchards and supplies seed for 12 species and 25 seed planning seed zones. The seed zones establish the sources of parents for the seed orchard programs and the distribution of the resulting improved seed. Seed registration provides oversight that ensures no GMO forest seed production.</p> <p>As of 2022, genetically modified tree research trials are only being conducted in Alberta, New Brunswick, Ontario and Quebec; these are typically small (i.e. approximately 2 ha). Spruce (<i>Picea</i> sp.) is the only species that has been identified as a candidate for genetic modification (Genome Canada). There are currently no trials in BC. The Forest Improvement and Research Management Branch ensures that no genetically modified tree seed is registered or used in operational forest planting on Crown land. There are two seed tracking registries (SPAR and RESULTS) that identify tree seed sources and seedling deployment to harvest blocks. Thus, all seedlings planted in BC can be traced to registered source. FRPA requires maintenance of records of seed used, including a map of planting locations by seed source. Commercially available GMO forest tree stock is not being grown and not available in BC. There are no reports of any use of any GMO seedlings in reforestation information.</p> <p>Risk conclusion and justification</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 BC. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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 • GMO protocols & trial data • Regeneration assessments, applicable to the supply base area • Site plans and/or post-activity inspections demonstrate negative impacts mitigated
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Food Inspection Agency – FIA - Division 28 (NovelFoods) section of the Food and Drug Regulations C.R.C., c. 870

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	<ul style="list-style-type: none"> • Genome Canada • Natural Resources Canada – Research on the potential environmental impact of genetically modified trees • Plant Protection Act • Questions and Answers: Revisions to Directive 94-08 – Assessment Criteria for Determining Environmental Safety of Plants with Novel Traits • Seed Act <p>Provincial</p> <ul style="list-style-type: none"> • Forest and Range Practices Act • Forest Genetics • Seed production • Tree Seed
<i>Risk rating</i>	Provincial Low risk

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

3.1.1	<p>LULUCF emissions shall be accounted for through one of the following routes:</p> <p>Route A</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>Route 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>Route C</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>
<i>Findings</i>	Scale of assessment

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	<p>Provincial</p> <p>Analysis</p> <p>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>Enforcement and monitoring</p> <p>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. 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. 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 British Columbia. 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 British Columbia) meets the requirements of Route A in this Indicator.</p> <p>Risk conclusion and justification</p> <p>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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Paris Agreement signatory • Nationally Determined Contributions for reduced GHG emissions targets and progress reports
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • European Union’s Renewable Energy Directive 2018/2001 (REDII)

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	<ul style="list-style-type: none"> • The Paris Agreement <p><u>Federal</u></p> <ul style="list-style-type: none"> • Canada's Nationally Determined Contribution
<i>Risk rating</i>	Provincial Low risk

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

3.2.1	<p>All feedstock sourcing shall be consistent with either of these two options:</p> <p>Option A 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>Option B 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>Scale of assessment Provincial</p> <p>Analysis 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 British Columbia (BC), there are no specific regulatory requirements that forests must be managed to maintain or increase carbon stocks.</p> <p>Enforcement and monitoring The federal Environment and Climate Change Canada is required to prepare an annual GHG inventory report, National Inventory Report: Greenhouse Gas Sources 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</p>

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	<p>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.</p> <p>NRCAN, in partnership with the BC Ministry of Forests (FOR), provides oversight and monitors forest carbon stocks, GHG emissions, and other fluxes.</p> <p>NRCAN's Carbon Budget Model results showed BC's total forest ecosystem carbon stocks declined by 156 million tonnes of carbon between 2017 and 2021. This represents a 1.0% net reduction in total forest ecosystem carbon stocks. The Carbon Budget Model data showed that the forest carbon stock decline between 2017 and 2021 was primarily due to natural disturbances like insect infestation and wildfires. Total emissions from natural disturbances between 2017 to 2021 were 138 million tonnes. In the early 2000s, the BC Interior experienced a severe mountain pine beetle outbreak, which killed most of the mid-aged and mature lodgepole pine. The main impact on total forest carbon is the loss of growth from the lodgepole pine. 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. More recently, BC has experienced severe wildfires in 2017, 2018, 2021 and 2023.</p> <p>Risk conclusion and justification</p> <p>The NRCAN data showed the provincial forest carbon stocks have declined 1% between 2017 and 2021. During this period, the loss of carbon due to natural disturbance has driven the loss of total ecosystem carbon. Based on evidence reviewed, British Columbia meets the criteria in Option B of the Indicator and is designated as low risk at the provincial level.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> ● Carbon stock analysis, accounting for natural disturbance, applicable to the supply base ● Permanent sample plot data, applicable to the supply base ● Chain of custody procedures, including fibre tracking ● Fibre procurement policy & procedures ● Supplier verification program ● Supplier transportation documentation (origin & species) ● Interview with suppliers
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> ● Natural Resources Canada (NRCAN). 2024. Forest carbon stocks calculated by the Carbon Budget Model of the Canadian Forest Sector. ● Forest Carbon Initiative <p><u>Provincial</u></p> <ul style="list-style-type: none"> ● BC Ministry of Forests. 2022 Economic State of British Columbia's Forest Sector.
<p><i>Risk rating</i></p>	<p>Provincial Low risk</p>

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3.2.2	<p>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.</p>
Findings	<p>Scale of assessment Crown Land Private Managed Forest Land Private Land</p> <p>Analysis 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. In British Columbia (BC), such sites could include sub-alpine and alpine forests and forests with thin, wet, or poor soils or with other limiting 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. 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.</p> <p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) Private Managed Forest Land <p>There is no regulatory framework to prevent harvesting sites with low productivity or difficult to regenerate on private managed private land.</p> <p><u>Other Private Land</u></p> <p>There is no regulatory framework to prevent harvesting sites with low productivity or difficult to regenerate on other private land.</p> <p>Enforcement and monitoring</p> <p><u>Crown Land</u></p> <p>The British Columbia (BC) Ministry of Forests (FOR) has authority to administer the Forest Act. The Forest 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. The process for determining an Allowable Annual Cut (AAC) is known as a Timber Supply Review. It is rigorous and has numerous steps, one of which is classifying the land base as Timber Harvesting Land Base (contributing) and Non-Harvesting Land Base (non-contributing). The Non-Harvesting Land Base areas are identified, excluded, and not available for harvest. BC's provincial forest inventory, maintained by the Forest Analysis and Inventory Branch FOR, rates the productivity of land based on site indices. Low-productivity sites (i.e., low site indices) are included in the Non-Harvesting Land Base and is therefore excluded from AAC calculations and the Timber Harvesting Land Base. Sites of low productivity</p>

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are correlated with sites that have renewal challenges. Licensees' Forest Stewardship Plans have approved stocking standards that harvested areas must meet. The standards are identified in the silviculture plans and prescriptions in individual cutblock site plans.

Private Managed Forest Land

The Managed Forest Council (MFC) administers the Private Managed Forest Land Program under the Private Managed Forest Land Act (PMFLA). Although the PMFLA does not reference low-productive sites, it is the regulatory framework for setting forest management goals on private managed forest land. One goal of the Private Managed Forest Land Program is to manage lands for long-term forest production. A key management objective requires the successful regeneration of areas where timber is harvested or destroyed and minimisation of disturbed area. The PMFLA Regulation requires harvested areas are to be regenerated promptly with a healthy, commercially valuable stand of trees. The MFC's Field Practices Guide aids private managed forest land owners in fielding decisions and practices to meet regulation requirements. Guidance includes legislated timeline requirements, best management practices, and forest management strategies to achieve successful regeneration. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting and reforestation activities.

Other 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 other private land.

Crown Land

The process of determining the timber harvesting land base, excluding low productive sites on crown land is undertaken through the office of the BC Chief Forester. FOR review and approve Forest Stewardship Plans. FOR monitor harvesting activities, including successful regeneration through the Compliance and Enforcement Program.

Private Managed Forest Land

MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including harvesting and regeneration. MFC conducts annual inspections, with a 10% inspection target. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting and reforestation activities. FOR may request MFC to conduct a formal audit on the Private Managed Forest Land Program.

Other 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 other private land.

Crown Land

Timber Supply Review reports document the removal of low productivity lands from harvest eligibility on Crown land. For example, the data package for the AAC determination in the Okanagan Timber Supply Area started with a gross area of 2,449,135 ha. A total of 479,808 ha of non-forest and unproductive area was removed, equivalent to 19.6% of the gross Timber Supply Area. The threshold for an unproductive site was a site index value of less than three metres (i.e., the stand would not attain three metres in height in 50 years). Another 159,030 ha was classed as having "low growing potential" and was also removed from the gross Okanagan Timber Supply Area. This accounted for 6.5% of the gross Timber Supply Area. These areas had site indices below six and a half metres to nine metres, depending on the leading species. In the Timber Supply Review for the Kamloops Timber Supply Area 28.5% of the gross Timber Supply Area was categorised as non-forested and low-productivity forest. A site index value of three metres was used to delineate low productivity stands. 6.3% of the gross Kamloops Timber Supply Area was removed from harvest eligibility due to "low growing potential". A site index of eight metres was used as the cut-off in the Kamloops analysis.

Private Managed Forest Land

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	<p>The last required Private Managed Forest Land Program audit by FOR was in 2013. The 2023 MFC Annual Report provides more recent data that verifies compliance of regeneration.</p> <p><u>Other Private Land</u> 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 other private land.</p> <p>Risk conclusion and justification</p> <p><u>Crown Land</u> 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. Timber Supply Review examples demonstrate that significant areas of low-productivity sites are removed from the timber harvesting landbase on Crown land in BC. Sites of low productivity are correlated with sites that have renewal challenges. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia.</p> <p><u>Private Managed Forest Land</u> On private managed forest land, there are no regulatory or process requirements which remove low productivity sites from harvest eligibility, and no evidence of the management of low productivity sites. However, MFC monitoring results verifies compliance with regeneration requirements on harvested blocks. Based on evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia.</p> <p><u>Other Private Land</u> Due to a lack of a regulatory framework, evidence to support implementation mechanisms, a monitoring framework and/or results to verify the identification and avoidance of timber harvesting from low-productive or difficult to regenerate sites, a precautionary approach is applied. As such, this Indicator is designated as specified risk for other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • 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 • Maps/data of low productive sites, applicable to the supply base • Records of regeneration failures, applicable to the supply base • Site plans and/or post-activity inspections demonstrate negative impacts mitigated • Supplier verification program • Supplier transportation documentation (origin & species) • Interviews with regulatory/oversight agency • Interview with experts

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<p><i>Evidence reviewed</i></p>	<p><u>Provincial</u></p> <ul style="list-style-type: none"> • Ministry of Forests Kamloops Timber Supply Area Timber SupplyReview Data Package – Update. Sept 2015. • Ministry of Forests Okanagan Timber Supply Area Timber SupplyReview Data Package – December 2017 • Private Managed Forest Land Act 						
<p><i>Risk rating</i></p>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Private Land	Specified risk						
<p>3.2.3</p>	<p>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).</p>						
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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. 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, Luyssaert et al. 2008). 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.” 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"> • Landscape-level: wide ranging species-at-risk, large landscape, and Intact Forest Landscapes. • Stand-level: small home range species-at-risk, rare, threatened and endangered ecosystems, and key habitat attributes, including old forests. <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</p>						

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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. 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 & 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.

Crown Land, Private Managed Forest Land & Other Private Land

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, private managed forest land and other private land.

Enforcement and monitoring

Crown Land, Private Managed Forest Land & Other 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, private managed forest land and other 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, private managed forest 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 high carbon stocks and high conservation values on Crown land, private managed forest land and other private land.

Crown Land, Private Managed Forest Land & Other 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, private managed forest land and other 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, private managed forest 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 high carbon stocks and high conservation values high carbon stocks on Crown land, private managed forest land and other private land.

Crown Land, Private Managed Forest Land & Other 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, private managed forest land, or other 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, private managed forest land, or other private land.

Risk conclusion and justification

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	<p><u>Crown Land, Private Managed Forest Land & Other Private Land</u></p> <p>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, private managed forest land and other 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, private managed forest land and other private land. Given the lack of evidence, a precautionary approach is applied. As such, this Indicator is designated as specified risk for Crown land, private managed forest land and other private land in British Columbia.</p>						
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Carbon stock analysis, applicable to the supply base and specific to high carbon stocks • High carbon stocks and high conservation values intersect analysis • 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 • Maps/data of high carbon stocks, applicable to the supply base • Maps/data of high conservation value, applicable to the supply base • Site plans and/or post-activity inspections demonstrate negative impacts mitigated • Supplier verification program • Interviews with regulatory/oversight agency • Interview with experts 						
<p><i>Evidence reviewed</i></p>	<p>See:</p> <ul style="list-style-type: none"> • Indicator 2.1.3 – Key Eco/HCV Maintained or Enhanced 						
<p><i>Risk rating</i></p>	<table border="0"> <tr> <td>Crown Land</td> <td>Specified risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Specified risk</td> </tr> <tr> <td>Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Specified risk	Private Managed Forest Land	Specified risk	Private Land	Specified risk
Crown Land	Specified risk						
Private Managed Forest Land	Specified risk						
Private Land	Specified risk						

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

<p>3.3.1</p>	<p>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.</p>
<p><i>Findings</i></p>	<p>Scale of assessment Provincial</p> <p>Analysis 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 that long-lived forest products include veneer, lumber, plywood, and other structural panels. Long-lived forest products 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 a 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.</p> <p>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.</p> <p>In British Columbia (BC), 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.</p> <p>Enforcement and monitoring BC'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, mainly sawlogs, are codependent with pulp mills and on 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 codependent relationship as well as pricing for different timber products.</p> <p>In practice, this means other than the allocations of timber rights in provincial licences, flows of timber are governed by business-to-business agreements and market pricing. Integrated forest products companies are highly incentivised by the profit motive to use sawlogs (i.e., high-quality stem wood) for lumber production. Similarly, harvest</p>

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	<p>contractors have incentive to maximise the revenue received for the timber harvested and are highly motivated to ensure that veneer logs go to veneer mills and sawlogs go to sawmills, which have quality specifications that preclude the use of pulpwood and other low-grade stem wood.</p> <p>There is no oversight framework in place specific to the principles of cascading as there are no relevant requirements or policies.</p> <p>Stumpage rates for Crown timber in BC are set quarterly and are based on the timber that is sold by auction on the market by BC Timber Sales. BC Timber Sales was created in 2003 to establish a market value for Crown timber through auctions of harvest blocks and it auctions roughly 20% of the timber in Crown allowable annual cut (AAC). The data from BC Timber Sales are put into a regression equation that uses species, size, volume/ha, quality, location, and terrain characteristics to estimate stumpage rates for the remaining Crown timber. There is no straightforward stumpage rate schedule in BC. The BC government reports regularly on average stumpage prices for very broad categories of timber. In the most recent report for the Interior, from July to September 2023 inclusive, the average price of a veneer bolt (i.e., a 'peeler') was \$151.12/m³, while sawlogs and pulpwood were priced at \$128.66/m³ and \$58.74/m³, respectively. Relative pricing was very similar in the preceding two quarters. In recent years, roughly 70% of the AAC on BC Crown land has been harvested. The BC AAC is estimated at 61.75 million m³/year (by adding the listed AACs for Timber Supply Areas, Tree Farm Licences, Community Forests and First Nations Woodland Licences). The 2021 Crown timber harvest was 44.3 million m³.</p> <p>Risk conclusion and justification</p> <p>Stumpage rate data indicate high-value stem wood is worth much more than low-value stem wood, and this price differential drives forest product cascading. The abundance of low-quality stem wood, indicated by the under-cut on Crown land compared to the estimated AAC, further supports the economic conditions that give rise to product cascading. 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 BC are largely dependent on residues produced by sawmills and many are twinned with large 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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Chain of custody procedures, including fibre tracking • Fibre procurement policy & procedures • Supplier transportation documentation (origin & species) • SBP supply base reports & SBP audit reports
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • Intergovernmental Panel on Climate Change Good Practice guidance for Land Use Land Use Change and Forests. Appendix 3a.1. Harvested wood products: basis for future methodological development. • 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. • World Business Council on Sustainable Development Circular bioeconomy: The Business Opportunity Contributing to a Sustainable World. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forest Practices Board - BC Timber Sales Program • Allowable Annual Cut for First Nation Forest Licences

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	<ul style="list-style-type: none"> • BC Community Forest Association • BC government Interior Log Market reports BC Ministry of Forests 2021 Economic State of British Columbia's Forest Sector • BC Timber Pricing • BC Forest Practices Board Glossary • BC government Tree Farm Licence Allowable Annual Cut • BC government TSA Allowable Annual Cuts
<i>Risk rating</i>	Provincial Low risk

Principle 4 – Feedstock sourcing benefits people and communities

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

4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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 Grievance & Dispute Mechanisms – Workplace.</p> <p>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. 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</p>

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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.

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:

- (1) The constitutive right to join with others and form associations;
- (2) The derivative right to join with others in the pursuit of other constitutional rights; and
- (3) The purposive right to join with others to meet on more equal terms the power and strength of other groups or entities.

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 British Columbia (BC) under the BC Labour Relations Code. The Code governs rights, duties, and unfair labour practices; collective bargaining; and strikes, 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 BC Labour Relations Code, implemented by the Ministry of Labour, establishes the BC Labour Relations Board which acts as an independent and impartial tribunal on issues related to labour in the province. Several components of the freedom of association and the right to collective bargaining are implemented by the BC Labour Relations Board. The Board actively oversees certification, revocation, strike or lockout applications, and supervises the various votes authorised by the Code. 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). 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 BC Labour Relations Board oversees all matters involved in the 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 Board self-reports on outcomes publicly and publishes all decisions on the Board’s website and the Canadian Legal Information Institute website.

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	<p>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 BC 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 practice. The 2023 ITUC Global Rights Index assigned Canada a rating of 3, where a score of 1 is exemplary and a score of 5 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.” Statistics Canada reports, as of September 2023, that BC has a rate of unionisation within the natural resource sector (forestry, fishing, mining, quarrying, oil & gas) of 30.1% of workers unionised. A review of the Canadian Foundation for Labour Rights’ website indicates that there have not been any concerns raised with freedom of association legislation in BC that would affect forestry in the last decade (September 2013- September 2023). An internet review conducted in September 2023 indicates unionisation of facilities is ongoing in BC and does not indicate that there are concerns with limitations to freedom of association and the right to collective bargaining in forestry in BC.</p> <p>Risk conclusion and justification</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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> ● Regulatory framework ● Regulatory agency websites ● Company human resources policies/procedures ● Collective bargaining agreements ● Regulatory compliance and enforcement data/reports ● Oversight agency database records and/or reports ● Publicly available information (reports, news & websites) ● Interviews with regulatory/oversight agency ● Interviews with trade unions ● Interviews with workers
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> ● International Labour Organization. Freedom of Association. ● International Labour Organization. What is collective bargaining. ● International Labour Organization. Ratifications for Canada. ● International Labour Organization. International Labour Standards on Freedom of Association. ● International Labour Organization. International Labour Standards on Collective Bargaining. ● International Labour Organization. How the ILO Works.

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	<ul style="list-style-type: none"> • International Labour Organization. Complaints. • International Labour Organization. Committee on Freedom of Association. • United Nations. Universal Declaration of Human Rights. December 10, 1948. • United Nations. Freedom of assembly and association. • United Nations. Special Rapporteur on freedom of peaceful assembly. • United Nations. Human Rights Council-mandated Investigative Bodies. • International Labour Organization. Canada Freedom of association cases. • International Trade Union Confederation. 2023 Global Rights Index. 2023 <p><u>Federal</u></p> <ul style="list-style-type: none"> • Government of Canada. Section 2(d) Freedom of Association. • Statistics Canada. Union coverage by industry, monthly, unadjusted forseasonality. • Canadian Foundation of Labour Rights. Restrictive Laws. • Canadian Legal Information Institute. Homepage. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Labour Relations Code. • British Columbia Labour Relations Board. Homepage. • British Columbia Labour Relations Board. Homepage. • British Columbia Labour Relations Board. Collective Agreements. • British Columbia Labour Relations Board. Reports. • British Columbia Labour Relations Board. Decisions.
<i>Risk rating</i>	Provincial Low risk
4.1.2	Forced or compulsory labour shall not be used.
<i>Findings</i>	<p>Scale of assessment</p> <p>Provincial</p> <p>Analysis</p> <p>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>

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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.

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.

The British Columbia (BC) Ministry of Labour regulates employment in the province, including the forest industry. The BC Employment Standards Act 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 Act specifies that the minimum standards set out in the Act cannot be avoided. The Employment Standards Act does not mention compulsory labour however it contains other provisions intended to ensure that employees are not overworked.

Enforcement and monitoring

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 BC through the Ministry of Public Safety and Solicitor General. The Ministry prosecutes crimes and shares information relative to legal issues. The BC Ministry of Labour implements the BC Employment Standards Act by maintaining a publicly available website of employment standards and deals with problems which arise with the application of the Act. The BC Employment Standards Tribunal conducts appeals on BC Ministry of Labour determinations. Where a collective agreement exists, trade unions would work closely with employers and employees to ensure the requirements of the Act or collective agreement is fully implemented.

The UN has appointed a Special Rapporteur on contemporary forms of slavery which monitors forced labour globally. The United Nations conducts investigations 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. 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. No publicly available oversight of RCMP relative to forced labour was found. The forestry industry is provincially regulated and labour issues are addressed by the BC Ministry of Labour. Contentious employment issues are typically initiated as a complaint by an employee or sometimes by a union. Hotlines are available for reporting any labour related concerns. Decisions of the BC Ministry of Labour can be appealed to the BC Employment Standards Tribunal. The Tribunal has the responsibility and authority to reconsider previous Tribunal

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	<p>decisions if they are challenged. The Employment Standards Tribunal self-publishes an annual report and publishes all decisions on the Tribunal website and the Canadian Legal Information Institute website. No publicly available oversight of trade unions relative to forced labour was found.</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. 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 Employment Standards Tribunal 2022/23 annual report (the last available as of September 2023), received 98 appeals and closed 128, some of which carried over from the previous reporting period. Of the 128 decisions, 104 confirmed the Decision of the BC Ministry of Labour, Employment Standards Branch. In the same annual report the Tribunal reports having received 58 applications for reconsideration and closed 61, some of which carried over from the previous reporting period. Of the 61 decisions, 57 applications for reconsideration were denied. An internet review conducted in September 2023 did not indicate there were any specific concerns with compulsory labour within the BC forest industry.</p> <p>Risk conclusion and justification</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. Forestry in Canada occurs outside metropolitan areas and is not an industry with high instances of forced labour. Based on the evidence reviewed, this Indicator is designated as low risk at the provincial level in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • United Nations. Universal Declaration of Human Rights. 10 December 1948. • United Nations. Special Rapporteur on contemporary forms of slavery. • United Nations. Human Rights Council-mandated Investigative Bodies.

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	<ul style="list-style-type: none"> • International Labour Organization. What are forced labour, modern slavery and human trafficking?. • International Labour Organization. Ratifications for Canada. • International Labour Organization. How the ILO Works. • International Labour Organization. Complaints. • International Labour Organization. Fair Recruitment Initiative. • International Labour Organization. Q & A on Business and Forced Labour. • Walkfree. Global Slavery Index. 2018. <p><u>Federal</u></p> <ul style="list-style-type: none"> • Justice Laws. Criminal Code of Canada. • Public Safety Canada. Human Trafficking. • Criminal Justice. Human Trafficking. • Public Safety Canada. Human Trafficking National Coordination Centre • Statistics Canada. Trafficking in Persons in Canada. 2020. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Employment Standards Act. • British Columbia Ministry of Labour. Employment Standards. • British Columbia Ministry Labour. Make a complaint. • British Columbia Employment Standards Tribunal. Homepage. • British Columbia Employment Standards Tribunal. Annual Reports.
<i>Risk rating</i>	Provincial Low risk
4.1.3	Child labour shall not be used.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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:</p> <ul style="list-style-type: none"> • 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;

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- 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 British Columbia (BC) Ministry of Labour, Employment Standards Branch regulates employment in BC, including the forest industry. The BC Employments Standards Act is consistent with the international definitions of child labour in that permissions are required in order to employ children 15 years of age and younger. There are a number of specific regulations, such as the type of work that may be completed, that apply to young people 15 years and younger and employers in BC. The Act applies to all non-union employees who fall under provincial jurisdiction, including temporary foreign workers. Conditions of a collective agreement must meet or exceed the Act, thus all workers regardless of union status, will be covered by the age-related regulation.

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. The BC Ministry of Labour implements the Employment Standards Act. The Ministry maintains a website specifying the requirements of the Act with specific plain language guidance on the regulatory framework around hiring young people. There is contact information on the website should employers, employees, parents or guardians have questions. The BC Employment Standards Tribunal conducts appeals BC Ministry of Labour of determinations. Trade unions support the prevention and elimination of child labour through ensuring collective bargaining agreements are honoured. Typically, within the BC 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. The BC Ministry Labour, Employment Standards Branch oversees the Employment Standards Act and grants permits for workers 15 years of age and younger. There is an anonymous tip line publicly available where anyone can report suspected violations with the Act. The Ministry conducts investigations on complaints and can make determinations. Determinations are publicly available on the Ministry website. Decisions of the Ministry of Labour can be appealed to the BC Employment Standards Tribunal. The Tribunal additionally has the

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	<p>responsibility and authority to reconsider previous Tribunal decisions if they are challenged. The Employment Standards Tribunal self- publishes an annual report and publishes all decisions on the Tribunal website and the Canadian Legal Information Institute website. 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 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. 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. The Employment Standards Tribunal 2022/23 annual report (the last available as of September 2023) received 98 appeals and closed 128, some of which carried over from the previous reporting period. Of the 128 decisions, 104 confirmed the Decision of the BC Ministry of Labour, Employment Standards Branch. In the same annual report the Tribunal reports having received 58 applications for reconsideration and closed 61, some of which carried over from the previous reporting period. Of the 61 decisions, 57 applications for reconsideration were denied. An internet review conducted in September 2023 does not indicate that child labour is an issue of concern in BC.</p> <p>Risk conclusion and justification</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 BC forest industry. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • International Labour Organization. Child Labour. • International Labour Organization. Ratifications for Canada. • International Labour Organization. How the ILO Works. • International Labour Organization. Complaints. • International Labour Organization. Child Labour Country Dashboard.

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	<ul style="list-style-type: none"> • Maplecroft. Child Labour Index. 2014. • United Nations. Ratifications for Canada. • United Nations. Convention on the Rights of the Child. 20 November 1989. • United Nations. Committee on the Rights of the Child. • United Nations. Human Rights Council-mandated Investigative Bodies. • International Labour Organization. About the International Programme on the Elimination of Child Labour. • United Nations Children’s Fund. Implementing and monitoring the Convention on the Rights of the Child. • United Nations Children’s Fund. Child Labour. 2022. <p>Provincial</p> <ul style="list-style-type: none"> • Employment Standards Act. • British Columbia Ministry of Labour. Hiring Young People. • British Columbia Ministry of Labour. Working in BC. • British Columbia Ministry of Labour. Investigations. • British Columbia Employment Standards Tribunal. Homepage. • British Columbia Employment Standards Tribunal. Annual Reports.
<i>Risk rating</i>	Provincial Low risk
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis International Labour Organization (ILO) Convention 111 describes discrimination as: (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. (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.</p>

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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.” British Columbia’s (BC’s) Human Rights Code prohibits discrimination and harassment based on Indigenous identity, race, colour, ancestry, place of origin, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender identity or expression, or age of that person or class of persons. Human rights related to employment are included in Sections 11 to 14. Equal pay for the same (or substantially the same) work is specified in Section 12(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 BC Human Rights Tribunal, an independent, quasi-judicial tribunal implements the BC Human Rights Code through public education and mediation services.

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. 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 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 BC Human Rights Tribunal oversees the BC Human Rights Code through resolution and settlement of complaints of discrimination, and through human rights tribunal and

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	<p>court hearings. Individuals can make complaints directly to the Tribunal.</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. 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. An internet review conducted in September 2023 found some instances of discrimination cases brought forward within the BC forest industry however there is no indication that there are serious issues of systemic discrimination in the forest industry in BC.</p> <p>Risk conclusion and justification</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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • International Labour Organization. C111 - Discrimination (Employment andOccupation Convention). 1958 • International Labour Organization. Ratifications for Canada. • International Labour Organization. C100 - Equal RemunerationConvention. 1951. • International Labour Organization. How the ILO Works. • International Labour Organization. Complaints. • United Nations. Universal Declaration of Human Rights. 10 December1948. • United Nations. Committee on the Elimination of Racial Discrimination.

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	<ul style="list-style-type: none"> • United Nations. Human Rights Council-mandated Investigative Bodies. • Human Rights Watch. Canada: Events of 2019. • World Economic Forum. Global Gender Gap Report 2021: Insight Report.203. <p>Federal</p> <ul style="list-style-type: none"> • Canadian Justice Laws. The Constitution Acts, 1867 – 1982. • Canadian Human Rights Commission. Homepage. • Canadian Human Rights Tribunal. Homepage. • Statistics Canada. Pay Gap 1998-2021. • Statistics Canada. Discrimination before and since the pandemic. 2022. <p>Provincial</p> <ul style="list-style-type: none"> • Human Rights Code. • British Columbia. Human Rights Commission. Homepage. • British Columbia. Human Rights Tribunal. Homepage.
<i>Risk rating</i>	Provincial Low risk
4.1.5	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.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>

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Under the Constitution of Canada, the responsibility for setting minimum wages for labour rests with the provinces. Through provincial labour laws, the British Columbia (BC) Ministry of Labour regulates employment in the province, including the forest industry. The BC Employment Standards Act sets standards for working hours. Section 16 of the Act specifies that employers must pay the minimum wage for employment. Section 3 of the Act specifies that an employer must adhere to the minimums of the Act regardless of whether the employee or trade union agrees to a lower wage.

Enforcement and monitoring

The BC Ministry of Labour provides information on the website about minimum wages for employment. There is a solutions explorer to help users find the correct information related to concerns. The BC Employment Standards Tribunal conducts appeals BC Ministry of Labour of determinations. 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.

The BC Ministry of Labour oversees the Employment Standards Act. Concerns can be raised to the Ministry and there is an anonymous tip line publicly available where anyone can report suspected violations with the Act. Decisions of the Ministry of Labour can be appealed to the BC Employment Standards Tribunal. The Tribunal additionally has the responsibility and authority to reconsider previous Tribunal decisions if they are challenged. The Employment Standards Tribunal self-publishes an annual report and publishes all decisions on the Tribunal website and the Canadian Legal Information Institute website.

As of September 2023, the minimum wage in BC is \$16.75/hour. The Canadian government reports, as of September 2023, the lowest wage of the lowest paid class of forestry workers (labourer, logging and forestry workers) in BC is \$18.00/hr. The BC government reports, as of September 2023, the low end for wages for logging, silviculture and forestry workers is \$18/hr and forestry professionals is \$31.87/hr. A search of all regions indicates the lowest paid forestry workers in BC are paid above the legal minimum wage. The Employment Standards Tribunal 2022/23 annual report (the last available as of September 2023) received 98 appeals and closed 128, some of which carried over from the previous reporting period. Of the 128 decisions, 104 confirmed the Decision of the BC Ministry of Labour, Employment Standards Branch Director. In the same annual report the Tribunal reports having received 58 applications for reconsideration and closed 61, some of which carried over from the previous reporting period. Of the 61 decisions, 57 applications for reconsideration were denied. An internet review conducted in September 2023 does not indicate payment below legal minimum wage or paying under the table is an issue of concern in BC within the forest industry.

Risk conclusion and justification

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 British Columbia.

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)

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	<ul style="list-style-type: none"> • Workforce/employment records • Interviews with regulatory/oversight agency • Interviews with trade unions • Interviews with workers
<i>Evidence reviewed</i>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Justice Laws. The Constitution Acts, 1867 – 1982. • Government of Canada. Prevailing Wages In Canada: Labourer, Logging and Forestry: British Columbia. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Employment Standards Act. • British Columbia Ministry of Labour. Employment Standards. • Government of British Columbia WorkBC. Logging and Forestry Labourers - Wages and Salaries. • British Columbia Employment Standards Tribunal. Homepage. • British Columbia Employment Standards Tribunal. Annual Reports.
<i>Risk rating</i>	Provincial Low risk
4.1.6	Working hours shall comply with legal requirements.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>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 British Columbia (BC) Employment Standards Act and Regulations sets standards for working hours. Part 4 of the Act specifies that standard work hours are eight hours a day and 40 hours a week. There are additional regulations establishing a minimum number of daily work hours and established periods of rest.</p> <p>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 laws,</p>

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	<p>the BC Ministry of Labour, Employment Standards Branch, regulates employment in the province, including the forest industry. The Ministry provides information on the website about working hours. The website provides a Solution Explorer tool, contact information for questions and an opportunity to submit a complaint.</p> <p>The BC Employment Standards Tribunal conducts appeals BC Ministry of Labour of determinations. 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. Trade unions negotiate working hours collectively on behalf of employees. Collective agreements are made public. The union can monitor working hours to</p> <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. The ILO regularly examines the application of standards in member states and points out areas where standards could be better applied. The BC Ministry of Labour, Employment Standards Branch, maintains a publicly available anonymous tip line where anyone can report suspected violations with the Employment Standards Act. Decisions of the Ministry of Labour can be appealed to the BC Employment Standards Tribunal. The Tribunal additionally has the responsibility and authority to reconsider previous Tribunal decisions if they are challenged. The Employment Standards Tribunal self- publishes an annual report and publishes all decisions on the Tribunal website and the Canadian Legal Information Institute website.</p> <p>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 Employment Standards Tribunal 2022/23 annual report (the last available as of September 2023) received 98 appeals and closed 128, some of which carried over from the previous reporting period. Of the 128 decisions, 104 confirmed the Decision of the BC Ministry of Labour, Employment Standards Branch Director. In the same annual report the Tribunal reports having received 58 applications for reconsideration and closed 61, some of which carried over from the previous reporting period. Of the 61 decisions, 57 applications for reconsideration were denied. 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 BC Employment Standards Act and Regulations is an issue of concern in BC within the forest industry.</p> <p>Risk conclusion and justification</p> <p>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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> ● 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) ● Salary Benchmarks by industry and region ● Workforce/employment records ● Interviews with regulatory/oversight agency ● Interviews with trade unions

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	<ul style="list-style-type: none"> • Interviews with workers
<i>Evidence reviewed</i>	<p><u>International</u></p> <ul style="list-style-type: none"> • International Labour Organization. C001 - Hours of Work (Industry)Convention. 1919. • International Labour Organization. Ratifications for Canada. • International Labour Organization. How the ILO Works. • International Labour Organization. Complaints. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Employment Standards Act. • British Columbia Ministry of Labour. Hours of work and overtime. • British Columbia Employment Standards Tribunal. Homepage. • British Columbia Employment Standards Tribunal. Annual Reports.
<i>Risk rating</i>	Provincial Low risk
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation.
<i>Findings</i>	<p>Scale of assessment Provincial</p> <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 collectively are basic social protections:</p> <ul style="list-style-type: none"> • Health care provisions; • Sickness benefits; • Retirement benefits; • Invalidity benefits; • Death benefits; and • Worker's compensation. <p>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.</p> <p>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</p>

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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 British Columbia (BC) Medicare Protection Act and Medical and Health Care Services Regulation provides the legal framework for the provision of health services in BC. In 2022, the BC Health Professions and Occupations Act was assented. It includes new provisions for oversight of health care professionals and health care provisions in British Columbia.

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 their 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 information on the Old Age Security Act.

Workers' Compensation

In BC, the Workers' Compensation Act provides the legal framework for the administration of workplace injury and illness prevention; and the 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.

Health Care Provisions

The Canadian 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 BC, front line provision of health services is provided by the BC 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.

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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 BC the Workers' Compensation Act is administered by the WorkSafeBC. WorkSafeBC 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 BC Worker's Compensation Act creates the Workers' Compensation Appeal Tribunal, which is an independent tribunal that hears appeals of decisions made by WorkSafeBC and makes binding decisions. See Health Care Provisions above for implementation mechanisms by trade unions and companies.

Enforcement and monitoring

Health Care Provisions

The Government of BC conducts periodic reviews of the health care service in the province. British Columbia Health Professions and Occupations Act was assented in November 2022, and includes oversight provisions in Part 9. As of September 2023, it does not appear the oversight is being implemented. 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 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 above for oversight of 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

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comments on the oversight of trade unions broadly. See Health Provisions above for oversight of 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 above for oversight of 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 above for oversight of companies.

Workers' Compensation

There is a process by which WorkSafeBC decisions and the fairness of the process can be reviewed. There are independent advisors to provide support free of charge. The government of British Columbia conducts periodic reviews of independent agencies. WorkSafeBC decisions can be appealed to the Worker's Compensation Appeal Tribunal. The Tribunal publishes annual reports and publishes all decisions on the Tribunal website and 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 above for oversight of 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, 12 are above average; four are the same; and 10 are below average performance when compared to the Canadian average performance. In 2015, the Conference Board of Canada assigns health performance in British Columbia at a "A" (on an A-D scale with A being best), rating it three out of 29 evaluated jurisdictions.

In a BC Health Services review, An Inquiry into the performance of the College of Dental Surgeons of British Columbia and the Health Professions Act, completed in 2019 suggested that BC "rip up the current program and start over". The British Columbia Health Professions and Occupations Act, was assented in Nov 2022 as a result; there is little information available on the new program as of the writing of this report in September 2023. An internet search, conducted in September 2023, found that there is an ongoing discussion about the long-term viability and effectiveness of all 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

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	<p>that there is an ongoing discussion about the long-term viability of Canada’s government pension programs, but there was no immediate concern identified.</p> <p><u>Invalidity Benefits</u> 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. 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.</p> <p><u>Death Benefits</u> 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.</p> <p><u>Workers’ Compensation</u> There is an annual report by the WorkSafeBC Board of Directors. The 2022 annual report (the last available as of September 2023) outlines both achievements and areas for improvement. PricewaterhouseCoopers undertakes a reasonable assurance engagement of the report, as specified by legislation. In the Workers’ Compensation Appeal Tribunal 2022 Annual Report (the last report available as of September 2023), the Tribunal reports receiving 2,389. Of the appeals heard in 2022, 66% of the WorkSafeBC decisions were confirmed.</p> <p>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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • International Labour Organization. Mission and Impact of the ILO. <p><u>Federal</u></p>

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	<ul style="list-style-type: none"> • Canada Health Act. • Employment Insurance Act. • Canada Pension Plan. • Old Age Security Act. • Canada health care system. • Employment and Social Development Canada. <ul style="list-style-type: none"> • Employment and Social Development Canada. Request for reconsideration of an Employment Insurance decision. • Social Security Tribunal of Canada. Homepage. • Canada Employment Insurance Commission. <ul style="list-style-type: none"> • Canada Employment Insurance Commission. 2020/2021 Employment Insurance Monitoring and Assessment Report. • Canadian Institute for Health Information. Homepage. • Conference Board of Canada. Health Report Card. February 2015. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Medicare Protection Act. • Health Professionals and Occupations Act. • British Columbia Ministry of Health. Homepage. • WorkSafeBC. Homepage. • WorkSafeBC. Review and Appeal. • WorkSafeBC. 2022 Annual Report and 2023-2025 Service Plan. • Workers' Compensation Appeal Tribunal. Homepage. • Workers' Compensation Appeal Tribunal. 2022 Annual Report. <p><u>Other</u></p> <ul style="list-style-type: none"> • Finlay A. McAlister, Peter Cram and Chaim Bell. Comparing Canadian healthcare to that in other countries: looking beyond the headlines. 2018. • Professional Standards Authority. An Inquiry into the performance of the college of Dental Surgeons of British Columbia and the Health Professions Act. December 2018.
<i>Risk rating</i>	Provincial Low risk
4.1.8	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.
<i>Findings</i>	Scale of assessment Provincial

Analysis

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.

Elements related to this Indicator are also discussed and assessed in the following Indicators:

- Health and safety requirements and safeguarding are described in 4.1.10 Workers H&S Safeguards;
- Waste disposal training is described in Indicator 2.2.8 Waste Disposal.

The 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. focus of this Indicator is to ensure that forest workers are trained in the forest planning and operations processes.

Provincial

- Professional Governance Act (2021)
- Forest Professionals Regulation
- Forest Act
- Scaling Regulation
- Private Managed Forest Land Act

Enforcement and monitoring

The Professional Governance Act is the legislation which ensures the competence, accountability, and protection of the public interest within self-regulated professionals in British Columbia (BC). Forest Professionals British Columbia (FPBC) is responsible for registering and regulating professional foresters and forest technologists in BC. The practice of forestry is broadly defined by the Forest Professionals Regulation under the Professional Governance Act as providing any advice or services in relation to trees, forests, forest lands, forest resources, forest ecosystems, or forest transportation systems and any ancillary advice or services. The experience or technical knowledge of a professional forester or forest technologist is needed and legally required if there are potential impacts to the protection of the environment, or the safety, health and welfare of the public. Regulated practice defines the broad area of practice where FPBC must regulate registrants. A subset of regulated practice is reserved practice. Reserved practice of forestry is where the advice and services provided can only be done by a forestry professional. The listing of professional forestry practice areas are identified on the FPBC website. Registered forestry professionals must adhere to the FPBC Bylaws, and FPBC Code of Ethical and Professional Conduct. Practising Registered Professional Foresters (RPFs) are entitled to engage in the full range of practice of professional forestry in BC. The accountabilities of an RPF are broadly defined and address forest and landscape level issues, including the design of forest management regimes to achieve long-term outcomes.

Risk conclusion and justification

At the professional level, mandatory requirements are set for academic standards of entry, standards of conduct, continuing professional development, and annual competence assessments. FPBC's regulatory framework ensures the ongoing training and competence of forest professionals registered to practice in BC. As such, this Indicator is designated as low risk at the provincial level in British Columbia.

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<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> ● 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 ● Publicly available information (reports, news & websites) ● Interviews with workers
<p><i>Evidence reviewed</i></p>	<p>Provincial</p> <ul style="list-style-type: none"> ● ABC FP Practice Review Annual Report 2019 ● ABC FP Practice Review Annual Report 2020 ● Board of Scaling Examiners – Examination Standards (July 2014) ● Forest Act ● Forest Professionals of British Columbia 2021 Professional Conduct Audit Report ● Forest Professionals of British Columbia Bylaws ● Forest Professionals of British Columbia Code of Ethical and Professional Conduct ● Forest Professionals of British Columbia Competence Audit Annual Report 2021 ● Forest Professionals of British Columbia Professional Forestry Practice Areas ● Forest Professionals of British Columbia Registrant Audits Summary Report 2022 ● Forest Professionals Regulation ● Managed Forest Council ● Natural Resource Compliance and Enforcement Database ● Private Forest Landowners Association ● Private Managed Forest Land Act ● Professional Governance Act ● Scaling Requirements in British Columbia (January 2018) ● Timber Scaling Regulation
<p><i>Risk rating</i></p>	<p>Provincial Low risk</p>

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<p>4.1.9</p>	<p>Mechanisms shall be in place for resolving grievances and disputes in the workplace.</p>
<p><i>Findings</i></p>	<p>Scale of assessment Provincial</p> <p>Analysis 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. 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. The British Columbia (BC) Human Rights Code addresses situations where grievances and disputes with an employer are related to human rights issues. Sections 21 – 31 of the Code relates to the filing and resolution of complaints. The BC Employment Standards Act sets standards for employment. Part 10 of the Act outlines the mechanisms for investigating and determining complaints. Part 12 of the Act addresses the BC Employment Standards Tribunal. The BC Labour Relations Code specifies the rights and responsibilities of the BC Labour Relations Board and trade unions in BC. The Code specifies several layers of dispute resolution.</p> <p>Enforcement and monitoring The BC Human Rights Commission acts as a watchdog monitoring human rights protection at a high level in BC. The BC Human Rights Tribunal implements the grievance and dispute mechanisms of the BC Human Rights Code. The Tribunal investigates and conciliates formal complaints of discrimination filed under the Code. These complaints may be about work conditions. The BC Ministry of Labour, Employment Standards Branch regulates employment in the province, including the forest industry under the BC Employment Standards Act. 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. The BC Employment Standards Tribunal conducts appeals BC Ministry of Labour of determinations. 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 BC Labour Relations Code establishes the BC 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. The BC Human Rights Commission reports on outcomes publicly in an annual report. The Human Rights Tribunal publishes all decisions on the Tribunal's website and the Canadian Legal Information Institute website. The BC Ministry of Labour, Employment Standards Branch provide an oversight function in employment and labour standards. Concerns can be raised to the Ministry and there is an anonymous tip line publicly available where anyone can report suspected violations with the Act. No public reporting on outcomes for the Ministry of Labour relative to workplace grievances were found. Decisions of the Ministry of Labour can be appealed to the BC Employment Standards Tribunal. The Tribunal additionally has the responsibility and authority to reconsider previous Tribunal decisions if they are challenged. The Employment Standards Tribunal</p>

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	<p>self- publishes an annual report and publishes all decisions on the Tribunal website and the Canadian Legal Information Institute website. No consistent mechanism for oversight of resolving grievances and disputes was found for trade unions. The BC 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 consistent mechanism for oversight of resolving grievances and disputes was found at the company level.</p> <p>The BC Human Rights Commission 2021/2022 annual report (the last report available as of September 2023), states that the Commission received 20,000+ inquiries over the 2021/2022 reporting period but does not give greater details. The BC Human Rights Tribunal made decisions on 21 cases in the 2021/22 reporting period (the last report as of September 2023) and 13 were related to employment. Of the 13 employment-related cases decided upon, six were decided in favour of the employee.</p> <p>The BC Ministry of Labour, Employment Standards Branch does not report on the number of complaints received or resolved. The Employment Standards Tribunal 2022/23 annual report (the last available as of September 2023) received 98 appeals and closed 128, some of which carried over from the previous reporting period. Of the 128 decisions, 104 confirmed the Decision of the BC Ministry of Labour, Employment Standards Branch Director. In the same annual report the Tribunal reports having received 58 applications for reconsideration and closed 61, some of which carried over from the previous reporting period. Of the 61 decisions, 57 applications for reconsideration were denied. Trade unions do not publicly report on the effectiveness at resolving grievances and disputes. The BC Labour Relations Board receives and resolves hundreds of grievances annually. In 2022 (the last report available as of September 2023), the Board reports having 388 open cases at the beginning of the annual period, receiving 1,300 and disposing of 1,214. 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 BC with the mechanisms for resolving grievances and disputes, neither in general, nor related specifically to the forestry industry.</p> <p>Risk conclusion and justification</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 British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Company human resources policies/procedures • Company grievance/dispute procedures • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Company records of grievance/dispute outcomes • Publicly available information (reports, news & websites) • Interviews with oversight agency • Interviews with trade unions • Interviews with workers
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Canadian Labour Congress. Chapters.

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	<ul style="list-style-type: none"> • Canadian Legal Information Institute. Homepage. <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Human Rights Code. • Employment Standards Act. • Labour Relations Code. • British Columbia’s Office of the Human Rights Commissioner. Homepage. • British Columbia Human Rights Tribunal. Homepage. • British Columbia Employment Standards Tribunal. Homepage. • British Columbia Employment Standards Tribunal. Annual Reports. • British Columbia Labour Relations Board. Collective Bargaining Agreements. • Government of British Columbia. Employment Standards. • British Columbia Labour Relations Boards. Homepage. • British Columbia Office of the Human Rights Commissioner. Reports and Submissions. • British Columbia Office of the Human Rights Commissioner. Cases. • British Columbia Human Rights Tribunal. Annual Reports. • British Columbia Human Rights Tribunal. How do I Find Human Rights Decisions?. • British Columbia Labour Relations Board. Reports. • British Columbia Labour Relations Board. Decisions. • British Columbia Office of the Human Rights Commissioner. Sparking Change 2022/23 and Service Plan 2023/24 to 2025/26. 2022/23. • British Columbia Human Rights Tribunal. Annual Report 2021-22. 2022. • British Columbia Labour Relations Board. 2022 Annual Report. 2022
<i>Risk rating</i>	Provincial Low risk
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p>

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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. 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

- Employment Standards Act
- Workers Compensation Act
- 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 British Columbia (BC) Ministry of Labour is responsible for the governance of the Employment Standards Act and the Occupational Health and Safety Regulation, which are the primary pieces of legislation that define industrial health and safety requirements. All BC employers must comply with this legislation. WorkSafeBC is a Crown agency, responsible for the Workers Compensation Act, Occupational Health and Safety Regulation, and associated policies and standards. WorkSafeBC promotes workplace safety, provides health and safety information to employers, workers and the public, establishes standards and guidelines for occupational health and safety. WorkSafeBC also assists injured or disabled workers and assesses employers. Under the Occupational Health and Safety Regulation, a workforce of 20 or more workers and one or more workplaces where there is a moderate or high risk of injury, or a workforce of 50 or more workers, requires a formal health and safety program; the Act describes the minimum content of the program. Employers with fewer than 20 workers require a less formal health and safety program, which includes documented regular monthly health and safety meetings that include matters concerning the correction of unsafe conditions and practices. Employers who hire one or more workers on a full-time, part-time casual or contract basis must register with WorkSafeBC.

Individuals are not required to register with WorkSafeBC if they are:

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- Partners or proprietors if the business is unincorporated and they don't hire any workers or unregistered subcontractors;
- Independent operators who are neither employers nor workers.

The WorkSafeBC Certificate of Recognition (COR) encourages employers to create an occupational health and safety management system that goes beyond legal requirements. The voluntary program recognises proactive employers. As part of the COR program, employers whose occupational health and safety management systems have passed an audit and are in good standing with WorkSafeBC are considered for financial incentives.

The BC Forest Safety Council (BCFSC) was established by industry in 2004 to improve the industry's safety record. BCFSC is the health and safety association for forest harvesters, sawmills, and pellet manufacturers in BC. The BCFSC works with forest sector employers, workers, unions, contractors, and provincial government agencies to support industry to implement necessary changes to eliminate fatalities and serious injuries. The BCFSC is a certifying partner for the WorkSafeBC COR program.

Forestry training courses related to health and safety are offered by the BCFSC and through industry organizations. Examples include:

- Chainsaw operation
- Light truck driving on resource roads
- Supervisor training

Through BCFSC, the BC forest sector has developed the SAFE Companies (Safety Accord Forestry Enterprise) certification that companies must attain prior to conducting work for forestry companies who request it. The SAFE Companies certification ensures a minimum standard of safety in forestry workplaces. Qualified companies are required to maintain safety programs that are audited annually to verify compliance. Companies register with the BCFSC, manage the safety program, conduct annual maintenance or recertification audits (first party or by a third party, depending on the type of SAFE certification). Audits are reviewed and approved by the BCFSC. SAFE certification is a requirement to conduct work for the BC government, which includes Crown land.

The Ministry of Labour oversees the Employment Standards Act, Workers Compensation Act and Occupational Health and Safety Regulation. WorkSafeBC conducts work site inspections of WorkSafeBC registered companies. WorkSafeBC has the legislative authority to write orders and bring prosecutions to improve safety and prevent accidents. Investigations can result from companies reporting incidents to WorkSafe BC, depending on the type of incident. WorkSafeBC rates are set based on performance, with fewer claims resulting in a lower rate for a company. WorkSafeBC 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 SAFE or COR certified employer to audit the employer's safety program, followed by annual audits to maintain certified status.

Clearance letters providing the status of any company registered with WorkSafeBC is publicly available. WorkSafeBC and the BCFSC publish annual reports detailing industry statistics and trends.

The WorkSafeBC 2022 Annual Report identifies forestry as an industry with a high rate of risk or injury. WorkSafe BC's focus is on inspections for manual tree falling, log transportation, cable yarding, mechanised harvesting and silviculture. WorkSafeBC received the following claims from the forestry sector: 1,358 in 2022, 1,307 in 2021, 1,322 in 2020, 1,594 in 2019, and 1,853 in 2018. The average percent of the total claims received by WorkSafeBC for forestry claims is 1%. In 2022 WorkSafeBC reported, 52,911 inspection reports were conducted and 33,704 orders were enforced. In 2021, 55,419 inspection reports were conducted and 32,422 orders were enforced. In 2020, 60,685 inspection reports were conducted and 27,066 orders were enforced. In 2019, 44,396 inspection reports were conducted and 34,136 orders were enforced. In 2018, 44,618 inspection reports were conducted, and 34,924 orders were issued. There is a public listing of SAFE certified companies on the BCFSC website that is updated with audit results and expiry dates of certification. As of December 2021, there are 2,981 companies with SAFE certification. In 2022, the BCFSC conducted 767 in-field visits, an increase of 15% from 2021. Forestry injury rates over the past five years include a 10% increase in sawmills, a decrease of 50% in the wood pellet and medium density fibreboard industries and no change to harvesting. WorkSafeBC Certificate of Recognition certification can be verified using the Employer Search Tool on the WorkSafeBC website.

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	<p>Companies who do work on Crown land must be WorkSafeBC registered. As employers who hire full-time or part-time workers, the majority of private managed forest land owners are WorkSafeBC registered. Other private land in BC is owned by individuals or and small businesses. As of March 2024, it is unknown how many of other private landowners have employees or are registered with WorkSafeBC. As of March 2024, there is no publicly available results to verify health and safety outcomes for non-WorkSafeBC registered companies who undertake harvesting or other forest operations.</p> <p>Risk conclusion and justification</p> <p><u>Provincial</u> BC 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 WorkSafeBC registered companies.</p> <p><u>Crown Land and Private Managed Forest Land</u> The majority of companies who harvest on Crown land and private managed forest land are WorkSafeBC registered. As such, are required to follow WorkSafeBC rules. WorkSafeBC conducts audits and site visits to ensure companies are compliant. Based on evidence reviewed, this Indicator is designated as low risk for Crown land and private managed forest land in British Columbia.</p> <p><u>Other Private Land</u> As other private land in BC is owned by individuals or small businesses, there is no requirement to be WorkSafeBC 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 other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> ● Regulatory framework ● Regulatory agency websites ● Company human resources policies/procedures ● Company Health & Safety programs/procedures ● Regulatory compliance and enforcement data/reports ● Oversight agency database records and/or reports ● WorkSafe Records/Statistics ● Company health & safety records ● Publicly available information (reports, news & websites) ● Interviews with regulatory/oversight agency ● Interviews with trade unions ● Interviews with workers
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> ● ILO Occupation Health <p><u>Federal</u></p> <ul style="list-style-type: none"> ● Canadian Labour Code Part II and regulations

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	<ul style="list-style-type: none"> • Hazardous Products Act <p>Provincial</p> <ul style="list-style-type: none"> • BC Human Rights Code • Employment Standards Act • Workers Compensation Act • Occupational Health & Safety Regulation (OHSR) • OHS Guidelines (WorkSafeBC) • BC Motor Vehicle Act • BC Commercial Transport Act • Transport of Dangerous Goods Act • Personal Information and Protection Act • WorkSafe BC Roles, Rights and Responsibilities • WorkSafe BC Annual Reports • BCFSC Annual Reports • BC Forest Safety Council • BCFSC SAFE Certified Company Listing • WorkSafe BC Annual Reports • WorkSafe BC Certificate of Recognition Program (COR) 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						

Criterion 4.2 – Feedstock sourcing benefits communities

4.2.1	Negative social and community impacts shall be identified and avoided.
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>The intent of this Indicator is to promote sustainable and responsible practices that benefit individuals and communities.</p>

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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 practices 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.

Crown Land

- Forest Act
- Forest and Range Practices Act
- Forest Planning and Practices Regulation (FPPR)

Private Managed Forest Land and Other Private Land

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

Enforcement and monitoring

Crown Land

The British Columbia Ministry of Forests (FOR) is responsible for ensuring consultation processes occur. Public engagement is required Timber Supply Reviews on Timber Supply Areas managed by FOR. Licensees develop Forest Stewardship Plans (FSPs) which must be made publicly available for review and comment. The FSP public consultation process allows for other tenure holders, professionals, communities, stakeholders, and the public to provide input into a Crown licensee's plan. Public notice of FSPs is the responsibility of the licensee and must be advertised for 60 days for comments to be received. If any comments have been provided, the crown licensee must provide the comments and description of changes made to the FSP because of the comments to FOR, prior to FSP approval.

Private Managed Forest 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 managed forest land.

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Other 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 other private land.

Crown Land

FOR is responsible for reviewing and approving FSPs submitted by Crown licensees. Consultation information from the FSP is provided to FOR to ensure adequate consultation. FOR either approves or makes recommendations to the licensee for the FSP, prior to approval.

Private Managed Forest Land

As of March 2024, there is no publicly available information describing an oversight framework related to the identification and avoidance of negative social and community impacts on private managed forest land.

Other Private Land

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

Crown Land

Through acceptable forms of consultation in the FSP process, FOR verifies that the identification and avoidance of negative social and community impacts is occurring on Crown land. Crown licensees cannot operate without the approval of FSPs from FOR. As of March 2024, there is no publicly available information indicating widespread or systemic non-compliance regarding the identification and avoidance of negative social and community impacts.

Private Managed Forest Land

Private managed forest land are managed at the landowners 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 managed forest land.

Other Private Land

Other private land is managed at the landowners 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 other private land.

Risk conclusion and justification

Crown Land

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 British Columbia.

Private Managed Forest Land

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 private managed forest land in British Columbia.

Other Private Land

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	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 British Columbia.						
<i>Means of verification</i>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites • Forest management plans • Best management practices and/or operational procedures • Consultation/engagement process • Grievance/dispute resolution mechanisms • Regulatory compliance and enforcement data/reports • Publicly available information (reports, news & websites) • Consultation/engagement notices, opportunities, meeting minutes, records, and applicable outcomes • Site plans and/or post-activity inspections demonstrate negative impacts mitigated • Interviews with regulatory/oversight agency • Interview with local government, community members, special interest groups/organisation 						
<i>Evidence reviewed</i>	<p><u>Provincial</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Specified risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Specified risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Specified risk						
Other Private Land	Specified risk						
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.						
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis The forest industry in British Columbia (BC) is highly integrated and predominantly manufactures solid wood products, including lumber, plywood and engineered wood products. Other forest products include pulp and paper production. The wood pellet industry utilises the by-product (sawmill and harvest residuals) of the rest of the forest sector. There are 11 wood pellet mills in BC. Six are located in the North Coast and Nechako development regions, three in the Thompson Okanagan, and one each in the Northeast and Cariboo.</p>						

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The forest sector is defined using Statistics Canada’s Input-Output Industry Classification. The Classification does not distinguish wood pellet operations from other forest sector operations, rather they are included in the overall numbers. For this Indicator, there are three subsectors:

- 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.
- 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).
- 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).

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 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 British Columbia (BC), 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.

There is no oversight framework that directs economic contributions from the forest industry to local communities.

The BC Council of Forest Industries engaged BDO Canada to conduct a study The Economic Impact of British Columbia’s Forest Sector, published in April 2024 with 2022 data. There are approximately 100,000 total jobs across BC related to the forest industry (48,725 direct, 30,678 indirect, 20,465 induced). In 2022, 36,115 people were employed in the forestry, logging, and support sector (17,890 direct, 11,084 indirect, and 7,141 induced). 45,392 people were employed in the wood products manufacturing sector, which includes pellet mills (23,895 direct, 12,155 indirect, 9,342 induced). The remaining 18,361 jobs are in the pulp and paper sector (6,940 direct, 7,439 indirect, 3,982 induced). In 2022, total labour income from the BC forest sector was \$9.1 billion (\$5.4 billion direct, \$2.5 billion indirect, \$1.2 billion induced). \$3.1 billion was from the forestry, logging and support sector (\$1.9 billion direct, \$0.9 billion indirect, \$0.4 billion induced). \$4.1 billion was from the wood product manufacturing industry (\$2.6 billion direct, \$1.0 billion indirect and \$0.5 billion induced). \$1.8 billion was from the pulp and paper manufacturing section (\$0.9 billion direct, \$0.7 billion indirect, \$0.2 billion induced). Forest sector wages are nearly 45% higher than the average earnings in BC (\$105.6k vs \$73.4k). For every direct and indirect job in the forestry, logging, and support sector, 1.6 jobs were generated. 2.0 jobs if induced jobs are included. There was \$43.9 billion in output (\$29.5 billion direct, \$9.0 billion indirect, \$5.3 billion induced). Output captures the total value of goods and services produced in the sector. \$13.0 billion was from the forestry, logging and support sector (\$8.1 billion direct, \$3.1 billion indirect, \$1.8 billion induced). \$22.2 billion in the wood products manufacturing sector (\$16.1 billion direct, \$3.6 billion indirect, \$2.5 billion induced). \$8.6 billion in the pulp and paper sector (\$5.3 billion direct, \$2.3 billion indirect, \$1.0 billion induced). There was \$17.4 billion in gross domestic product (GDP) (\$8.9 billion direct, \$4.8 billion indirect, \$3.6 billion induced). \$5.5 billion was from forestry, logging, and support activities (\$3.1 billion direct, \$1.3 billion indirect, \$1.1 billion induced). \$8.3 billion was from wood

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	<p>products manufacturing (\$4.5 billion direct, \$2.0 billion indirect, \$1.8 billion induced). \$3.6 billion was from pulp and paper manufacturing (\$1.4 billion direct, \$1.5 billion indirect, \$0.8 billion induced). Between 2013 and 2022, approximately \$15.8 billion was invested in BC by the forest sector in capital expenditures, repair, and maintenance. \$7.1 billion was capital expenditures and \$8.7 billion was repairs and maintenance. There was \$6.6 billion in government revenue, with \$2.3 million going to the federal government, \$4.0 billion to the provincial government and \$325 million to municipal governments. This includes tax revenue and other revenue such as logging tax, stumpage, annual rent, and fees in lieu. In the North Coast and Nechako development regions of BC, where there are six pellet mills, in 2022 there was \$4.0 billion in total goods and services, \$1.5 billion GDP, and \$828 million in labour income from the forest products industry. In 2022, 9,172 people were employed in the forest sector (direct, indirect, and induced) in the North Coast and Nechako regions. With 43,400 people employed in these regions (Statistics Canada 2023), the forest sector makes up approximately 21.1% of the employment in the region. In the Thompson/Okanagan development region, where there are three pellet mills, in 2022, there was \$8.0 billion in total goods and services, \$3.2 billion in GDP, and \$1.6 billion labour income because of the BC forest industry. In 2022, 18,152 people were employed in the forest sector (direct, indirect, and induced) in the Thompson Okanagan. With 303,200 people employed in the Thompson/Okanagan overall (Statistics Canada 2023), the forest sector makes up 6.0% of the employment in the region. In the Northeast development region of BC, where there is one pellet mill, in 2022 there was \$1.3 billion in total goods and services, \$515 million in GDP, and \$269 million in labour income. 2,910 people were employed in the forest sector (direct, indirect, and induced) in the Northeast. With 36,200 employed in the Northeast (Statistics Canada 2023), the forest sector makes up 8% of employment the region. In the Cariboo development region, where there is one pellet mill, in 2022, there was \$9 billion in total goods and services, \$3.6 billion in GDP, and \$1.8 billion in labour income. In 2022, 19,626 people were employed in the forest sector (direct, indirect, and induced) in the Cariboo. With 84,700 employed in the Cariboo (Statistics Canada 2023), the forest sector makes up 23.2% of employment in the region.</p> <p>Risk conclusion and justification</p> <p>There is a highly integrated forest products industry in BC. Biomass-related activities contribute to local economies for outputs, GDP, employment, and capital investment. Based on evidence reviewed, this Indicator is designated as low risk at the provincial level in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Company policies/procedures for employment, procurement and contributions within the local economy • Regional and/or sectoral analysis reports and economic studies • Company records of economic contributions to local economy • Workforce/employment records • Publicly available information (reports, news & websites) • Interviews with local government, business, workers, community members, special interest groups/organisation
<p><i>Evidence reviewed</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Statistics Canada <p><u>Provincial</u></p> <ul style="list-style-type: none"> • The Economic Impact of British Columbia's Forest Sector, BC Council of Forest Industries, 2024. • BC Economic Regions, Trade and Invest BC <p><u>Other</u></p> <ul style="list-style-type: none"> • Wood Pellet Location Map, Wood Pellet Association of Canada

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<i>Risk rating</i>	Provincial Low risk
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced.
<i>Findings</i>	<p>Scale of assessment Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis 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, & Traditional Tenure & Use Rights and Indicator 4.2.6 Consultation/Accommodation. Negative impacts on non-Indigenous communities are considered under Indicator 4.2.1 Negative Social & Community Impact 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 community watersheds and licensed water intakes is the focus of this Indicator.</p> <p>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.</p> <p><u>Provincial</u> The Drinking Water Protection Act protects drinking water from health hazards in British Columbia (BC). The Ministry of Health, through health authorities, is responsible for the oversight of the Drinking Water Protection Act. Drinking Water Protection Plans developed by the Ministry of Health can directly impact forestry activities. The Water Sustainability Act, and the Water Sustainability Regulation is the implementation mechanism for the diversion and use of water resources. The Ministry of Environment and Climate Change Strategy (MECCS) is responsible for the Water Sustainability Act. MECCS is responsible for the issuance of water licenses. The Drinking Water Protection Act and Water Sustainability Act are applicable on Crown land, private managed forest land and other private land.</p> <p><u>Crown Land</u> Additional to provincial requirements, the BC Ministry of Forests (FOR) has authority to administer the Forest and Range Practices Act (FRPA) which provides the regulatory framework for protection and conservation of water quality related to forest management on Crown land. Water quality is one of 11 resource values under FRPA that FOR</p>

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requires to be managed and protected. Community watersheds are an objective of the Forest Practices and Planning Regulation (FPPR) and are identified and designated under the Government Actions Regulation. The FPPR community watersheds objective is applicable when water is being diverted for human consumption through a licensed waterworks (water supply intake) in a community watershed. The goal of the FPPR community watershed objective is to prevent adverse impact on the quantity of water or the timing of the flow of water to the waterworks. Community watersheds restrict activities of Crown licensees, such as buffers, road-building, and harvesting within community watershed areas. On Crown land, licensees' Forest Stewardship Plans (FSPs) must address FRPA and FPPR objectives, including water quality. Implementation of FSPs and individual site plans address water quality objectives through conservation of quality, quantity, and timing of water flow, and prevention of cumulative hydrological effects having material adverse effect on water and stream crossings. The Forest Professionals of British Columbia (FPBC) has developed best practices guidance for watershed assessment to assist forestry professionals in the implementation of FRPA and FPPR.

Private Managed Forest Land

Additional to provincial requirements, the Managed Forest Council (MFC) is an independent provincial agency established under the Private Managed Forest Land Act (PMFLA) to administer the Private Managed Forest Land Program and protect key environmental values on private managed forest land in BC. Water quality in relation to the protection of human drinking water both during and after harvesting, is one of five key managed objectives as described in the PMFLA. As legislated in the PMFLA, primary forest activities including timber harvesting, road construction, maintenance or deactivation, and silviculture treatments must not result in sediment or other material being transported to or deposited in a stream if it will have an adverse effect on the quality of drinking water that may affect human health, or water that is diverted by a licensed waterworks intake. The MFC's Field Practices Guide is provided to private managed forest land owners as an aid to make decisions and outlines practices to meet regulatory requirements. Water protection guidance is provided in relation to harvesting, road construction and deactivation, and silviculture practices on private managed forest land.

Other Private Land

Other private land owners are to follow the provincial requirements of the Drinking Water Protection Act and Water Sustainability Act. As of March 2024, there is no publicly available information describing implementation mechanisms for the protection of human drinking water on other private land.

Enforcement and monitoring

Provincial

The Ministry of Health is responsible for the oversight of the Drinking Water Protection Act. MECCS is responsible for the oversight of the Water Sustainability Act, and Water Sustainability Regulation. FOR is responsible for the oversight of water management and conservation under the Water Sustainability Act through compliance inspections, investigations, and enforcement. The Compliance and Enforcement Branch (CEB) is responsible for updating the Natural Resource Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. Potential violations can be reported to "Report of Natural Resource Violation" online or via phone. Suspected contraventions of the Water Sustainability Act are investigated by the CEB.

Crown Land

On Crown land, FOR reviews and approves FSPs, which includes licensees operating in community watersheds near licensed water intakes. FOR is responsible for inspections of primary forest activities to ensure compliance with FRPA, FPPR, and approved operations plans related to water. The Forest and Range Evaluation Program (FREP) monitors the effects of forestry-related disturbances on water quality. The water quality effectiveness evaluation protocol evaluates the likelihood of forestry- disturbed sites to generate and transport fine sediment to natural water bodies, which can include drinking water sources. FREP water quality monitoring is not specific to human drinking water. The Forest Practices Board (FPB) conduct reviews of how well forest management practices maintain water quality in relation to community watersheds and licenced water intakes, as well as reviews of complaints related to practices in community watersheds.

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Private Managed Forest Land

MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including water quality (protection of human drinking water). MFC conducts annual inspections, with a 10% inspection target of all private managed forest land. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting and reforestation activities. FOR may request formal audits to be conducted on the private managed forest land program.

Other Private Land

The Water Sustainability Act applies to other private land. Other private land owners are responsible for the oversight of operations. As of March 2024, there is no publicly available information describing an oversight or monitoring framework for the protection of drinking water on other private land.

Provincial

A public geospatial database of consumptive water licence points of diversion for drinking water systems in BC is available on the BC Data Catalogue website. The Natural Resource Compliance and Enforcement Database indicates there were no violations to the Drinking Water Protection Act from 2018 to 2023. Contraventions of the Water Sustainability Act are identified in the Natural Resource Compliance and Enforcement Database. The majority of contraventions are not related to forestry activities. There were no contraventions to FRPA or the FPPR from 2018 to 2023 identified in the Natural Resource Compliance and Enforcement Database. The 2014 Forest Practices Board's Community Watersheds: From Objectives to Results on the Ground. Special Investigation reports 26% of land in BC's 466 community watersheds are within private managed forest land and other private land boundaries. In 42 of the community watersheds, more than 90% of land is within private land boundaries and 24 is entirely in private land.

Crown Land

The FPB's 2022 report stated "Forest licensees in BC generally demonstrate a high degree of compliance with FRPA's legal requirements relating to water, and some licensees voluntarily go beyond the legal requirements, however issues still arise." In 2019 FPB investigated the Peachland, Trepanier Creek, and Glade community watersheds. Investigation results found forestry personnel had undertaken proper assessments and implemented appropriate practices. FREP water quality condition data from 2016 to 2021 indicates 73% of sites inspected were designated as very low or low impact and 5% were of high impact rating. The remaining 22% of sites inspected were designated as moderate impact. The data does not identify specific information related to drinking water results.

Private Managed Forest Land

The most recent MFC audit of the private managed forest land program (2013), Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the Private Managed Forest Land Act, sampled approximately one-third of the managed forests in the program. The audit found the MFC is unable to assess the potential cumulative effects from activities on water quality within the private managed forest land portion in a water catchment due to licensed waterworks intake physical boundaries. One finding related to water management issues was found in the review of 2018 to 2022 MFC annual inspection reports. There were no impact to water quality or drinking water intakes findings.

Other Private Land

As of March 2024, there are no publicly available results to verify the current condition of the protection of watershed or human drinking water on other private land in BC.

Risk conclusion and justification

Crown Land

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	<p>There is a regulatory framework and implementation mechanisms for the protection of drinking water on Crown land. CEB Natural Resources Database and Forest Practices Board reports verify compliance with FRPA and FPPR for the protection of human drinking water. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia.</p> <p><u>Private Managed Forest Land</u></p> <p>There is a legislative framework, implementation mechanisms and a monitoring framework in place on private managed forest land. MFC annual reports verify compliance with the protection of human drinking water as per PMFLA requirements. Based on evidence reviewed, this Indicator is designated as low risk for private managed forest land in British Columbia.</p> <p><u>Other Private Land</u></p> <p>There are provincial legislative requirements for the protection of human drinking water on 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 human drinking water. Due to a lack of evidence, a precautionary approach is applied, and this Indicator is designated as specified risk for other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites • Forest management plans • Best management practices and/or operational procedures, including assessment of impacts and implementation of mitigation measures • Consultation/engagement process • Grievance/dispute resolution mechanisms • Regulatory compliance and enforcement data/reports • Oversight agency database records and/or reports • Consultation/engagement notices, opportunities, meeting minutes, records, and applicable outcomes • Site plans and/or post-activity inspections demonstrate negative impacts mitigated • Supplier verification program • Interviews with regulatory/oversight agency • Interview with local government, community members, special interest groups/organisation • Interview with experts
<p><i>Evidence reviewed</i></p>	<p><u>Provincial</u></p> <ul style="list-style-type: none"> • Drinking Water Protection Act • Water Sustainability Act • Forest and Range Practices Act • Forest Planning and Practices Regulation • Government Actions Regulation • Private Managed Forest Land Act

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	<ul style="list-style-type: none"> • Forest Practices Board. Forest Practices and Water. Opportunities for Action. Special Report. FPB/SR/60. January 2022. • Forest Practices Board. Watershed Assessment in the Glade Community Watershed. Complaint Investigation #18045. FPB/IRC/232. July 2020. • Forest Practices Board. Forestry Activities in the Peachland and Trepanier Creek Community Watersheds. Complaint Investigation #17046. FPB/IRC/224. September 2019. • Forest Practices Board. Community Watersheds: From Objectives to Results on the Ground. A Special Investigation. FPB/SIR/40. April 2014. • BC Government Response to FPB/SIR/40 • Managed Forest Council Annual Reports 2017 – 2022 • Drinking Water Sources (Surface Water PODs) - Datasets - Data Catalogue(gov.bc.ca) 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Specified risk						
4.2.4	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.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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." SBP's glossary does not define traditional tenure or use rights. In British Columbia, Indigenous people 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 & Community Impact ID & 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 BC. This Indicator evaluates if Indigenous rights have been identified, documented and respected.</p> <p>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.</p>						

Annex 1 Detailed findings for Supply Base Evaluation

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.

International

- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) Federal

Federal

- Constitution Act, 1982
- United Nations Declaration on the Rights of Indigenous Peoples Act (UNDRIP Act), 2021
 - Truth and Reconciliation Commission (TRC)'s Calls to Action

Historic Treaties

- Douglas Treaties
- Treaty #8

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

Modern Treaties

There are four modern treaties with eight First Nations:

- Nisga'a Final Agreement
- Tsawwassen Final Agreement
- Maa-nulth Final Agreement (five member First Nations)
- Tla'amin Final Agreement

Provincial

- Declaration on the Rights of Indigenous Peoples Act (DRIPA)
- Forest Act
- Forest and Range Practices Act (FRPA)
- Forest Planning and Practices Regulation (FPPR)

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. 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. 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”

In 2019, following a joint development process with First Nations leadership, British Columbia (BC) passed Bill 41, the Declaration on the Rights of Indigenous Peoples Act (DRIPA). DRIPA is to advance reconciliation and bring current laws into conformance with UNDRIP. DRIPA includes provisions for the BC government to enter into agreements for joint decision-making and consent with Indigenous Peoples. In March 2022, the BC government released the five-year Declaration Act Action Plan that works towards the implementation of DRIPA. The Action Plan was developed with Indigenous leadership. One of the plan's actions is 2.10: “Reform forest legislation, regulations and policy to reflect a shared strategic vision with First Nations that upholds the rights and objectives of the UN Declaration.” In March 2022, the Shared Priorities Framework between the Province of British Columbia and Members of the Alliance of BC Modern Treaty Nations was signed, which sets out BC government commitments to implementing the treaties, including the provision of adequate resourcing. Forest Consultation and Revenue Sharing Agreements provide First Nations communities with a portion of stumpage from timber harvested from traditional territories. The modern-day treaties contain dispute resolution mechanisms and the parties could utilise the courts, should the mechanisms outlined in a treaty not bring about a resolution. Grants of tenure to First Nations are through First Nations Woodland Licences and Community Forest Licences and enhanced requirements for consultation during the development of Forest Stewardship Plans (FSPs). First Nations Woodland Licences are awarded to First Nations and First Nations forestry enterprises and recognise First Nations’ land and resource interests, including the protection of traditional-use practices and the management of non- timber forest products. The BC government has published Building Relationships with First Nations: Respecting Rights and Doing Good Business (2014), Guide to Involving Proponents when Consulting First Nations (2014), and Updated Procedures for Meeting Legal Obligations When Consulting First Nations (2010). See Indicator 4.2.6 Consultation/Accommodation for further information on consultation. The BC government has recognised the Métis Nation of British Columbia as the representative body for Métis in BC. In October 2021, a Letter of Intent was signed by the BC government and Métis Nation of British Columbia which committed to strengthening the relationship, and the two parties have since been working on a reconciliation agreement that aligns with DRIPA. As of March 2024, there is no publicly available information regarding Indigenous Peoples’ tenure and use rights being asserted on private managed forest land or other private land in BC.

The BC Ministry of Indigenous Relations and Reconciliation implements and provide oversight the Declaration Act Action Plan. As of March 2024, there is no publicly available information regarding oversight with respect to Indigenous Peoples’ tenure and use rights on private managed forest land or other private land.

Indigenous rights have been affirmed through the federal Constitution Act and UNDRIP Act. These rights are being defined through the court system. As a result of Declaration Act Action Plan, the province has amended the Forest Act, the Forest and Range Practices Act, and the Forest Practices Code of BC to put more emphasis on ecological and cultural values in forest management. The province has set up a modern-day treaty process in which many First Nations are participating. To date, four modern treaties involving eight First Nations have been signed. The Haida Nation vs BC, 2004, ruling was regarding the province’s duty to consult. The 2014 Tsilhqot’in Nation vs BC case established Tsilhqot’in had Aboriginal title over a substantial area the Nation had long occupied. In 2021, the Blueberry River First Nations (Yahey) v. Province of British Columbia case found that the BC government had breached the treaty rights of the First Nation. In 2021, 136 participating First Nations collectively received \$58.8 million from the Forest Consultation and Revenue Sharing Agreements. Signed Consultation and Revenue Sharing Agreements have identified agreed- upon consultation processes related to forestry. Where these agreements are not in place, the standard consultation processes apply. In 2022, the Ministry of Indigenous Affairs and Reconciliation announced that the government was moving the Forests Consultation and Revenue Sharing Agreements “away from the short-term transactional approach of the past toward a new fiscal framework that recognizes, respects and supports Indigenous Peoples’ right to self-determination” and more than double the revenue would be shared. As of March 2024, there is no publicly available information regarding Indigenous Peoples’ asserting tenure and use rights on private managed forest land or other private land.

Risk conclusion and justification

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	<p>A legal framework exists in BC to identify, document, and respect traditional tenure and use rights of Indigenous Peoples. The BC government has passed DRIPA, has a Declaration Act Action Plan, and works collaboratively with Indigenous leadership. There are Consultation and Revenue Sharing Agreements that identify consultation processes. There are a range of programs to advance First Nations participation in forestry and forest management. Based on evidence reviewed, this Indicator is designated as low risk for Crown land in British Columbia. Indigenous Peoples have not asserted tenure and use rights on private managed forest land and other private land. As such, this Indicator is designated as specified risk on private managed forest land and other private land in British Columbia.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • UN Declaration on the Rights of Indigenous Peoples <p><u>Federal</u></p> <ul style="list-style-type: none"> • Constitution Act, 1982, section 35 • UN Declaration on the Rights of Indigenous Peoples Act <p><u>Bi-lateral</u></p> <ul style="list-style-type: none"> • Maa-nulth Final Agreement • Nisga'a Final Agreement • Tla'amin Final Agreement • Tsawwassen Final Agreement • Shared Priorities Framework between the Province of British Columbia and Members of the Alliance of BC Modern Treaty Nations • Boston Bar First Nation Forest and Range Consultation and Revenue Sharing Agreement with the Province of British Columbia

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	<p>Provincial</p> <ul style="list-style-type: none"> • Building Relationships with First Nations: Respecting Rights and Doing Good Business, Province of British Columbia. 2014. • Declaration Act Action Plan • Declaration on the Rights of Indigenous Peoples Act • Declaration on the Rights of Indigenous Peoples Act Annual Report 2020-21. • Declaration on the Rights of Indigenous Peoples Act Annual Report 2021-22. • Forest Act • Forest and Range Practices Act • Forest Planning and Practices Regulation • Guide to Involving Proponents when Consulting First Nations, Province of British Columbia. 2014. • Updated Procedures for Meeting Legal Obligations When Consulting First Nations, Province of British Columbia. 2014. 						
<i>Risk rating</i>	<table border="0"> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Specified risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Specified risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Specified risk						
Other Private Land	Specified risk						
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land Private Managed Forest Land Other Private Land</p> <p>Analysis</p> <p>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.</p> <p>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.</p> <p><u>Crown Land, Private Managed Forest Land, and Other Private Land</u></p>						

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- Freedom of Information and Protection of Privacy Act

Crown Land

- Forest Act
- Forest and Range Practices Act

Private Managed Forest Land

- Private Managed Forest Land Act
- Private Managed Forest Land Act Regulations Other Private Land

The British Columbia (BC) judicial system regulates grievances and disputes regarding other private land.

Enforcement and monitoring

Crown Land

The BC Ministry of Forests (FOR) regulates compliance with the Forest Act and the Forest Range and Practices Act and relevant regulations. A natural resource violation can be reported to the FOR Compliance and Enforcement Branch (CEB). Personal information does not have to be supplied to file a complaint. Violations may relate to fire, water, road use, forestry operations, or misuse of Crown lands. Under the Forest and Range Practices Act (FRPA), whistle-blower protection exists for individuals who make a complaint. Individuals can file a concern or complaint with the Forest Practices Board (FPB). Private Managed Forest Land The Managed Forest Council (MFC) regulates compliance with the Private Managed Forest Land Act (PMFLA). Inquiries and complaints regarding private managed forest land can be submitted to the MFC by private managed forest land landowners or other interested parties, including the public. The confidentiality of information collected by the MFC as part of an investigation is governed by the Freedom of Information and Protection of Privacy Act. MFC's Compliance Determinations Procedure Manual describes the process that the MFC follows to ensure that the compliance decision-making process is open and understandable to the public. The formal requirements of MFC's compliance decision-making process are set out in the PMFLA.

Other Private Land

On other 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 other private land are conducted through the provincial judicial system.

Crown Land

FOR's CEB officers are responsible for compliance with legislation and take enforcement actions as necessary, including following up on complaints. When the FPB receives a complaint, an investigator is assigned to the file and will contact the person filing the complaint. If no resolution is possible without an investigation, the investigator will assist with filing a complaint with the FPB. If the complaint cannot be resolved, the FPB will complete the investigation and may make recommendations in a report to the participants, which will be published and made publicly available.

Private Managed Forest Land

FOR's CEB officers are responsible for compliance with legislation and take enforcement actions as necessary. The PMFLA is a secondary responsibility of FOR's CEB officers. Under the PMFLA, the MFC may decide whether a private managed forest land owner contravened the PMFLA or PMFLA Regulations. A determination generally follows a formal investigation initiated by a complaint. Determinations may be followed by other steps, including Reconsideration of the Council Decision and Appeal to the Forest Appeals Commission. MFC is responsible for enforcement of the PMFLA and PMFLA Regulations. In the case of landowner non-performance, the MFC may request that BC

Annex 1 Detailed findings for Supply Base Evaluation

Assessment review if the land is eligible to be a private managed forest land only after pursuing other reasonable means of enforcement. MFC conducts field reviews and investigations, which can be initiated by a concern or inquiry from a stakeholder, including the public.

Other Private Land

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

Crown Land

As of March 2024, there are no entries of disputes or grievances related to tenure use and rights on the publicly available BC Natural Resources Compliance and Enforcement database. Forest Practices Board Annual Reports identified the following concerns or complaints:

	Concerns Received	Concerns On-Going	Complaints Received	Complaint On-Going
2022/2023	55	6	4	4
2021/2022	80	2	8	7
2020/2021	51	8	9	10
2019/2020	52	7	8	8
2018/2019	61	10	8	10

As of March 2024, there is no publicly available information indicating widespread or systemic grievances or disputes relating to tenure and use rights of the forest and other land management practices.

Private Managed Forest Land

As of March 2024, there were no PMFLA natural resource violations recorded in the BC Natural Resources Compliance and Enforcement Database. There were no contraventions related to grievances or disputes related to tenure or tenure use rights on the MFC website. The judicial system is the mechanism to resolve grievances and disputes resolution on private managed forest land.

Other 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 other 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 British Columbia.

Private Managed Forest Land

Systems and mechanisms are in place to resolve grievances or disputes regarding tenure or use rights on private managed forest 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 private managed forest land in British Columbia.

Other Private Land

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	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 British Columbia.						
<i>Means of verification</i>	<ul style="list-style-type: none"> • Regulatory framework • Forest management plans • Consultation/engagement process • Grievance/dispute resolution mechanisms • Regulatory compliance and enforcement data/reports • Publicly available information (reports, news & websites) • Grievance/dispute resolution opportunities, meeting minutes, records, and applicable outcomes • Interviews with regulatory/oversight agency • Interview with individual/organisation that initiated the grievance/dispute • Interviews with experts 						
<i>Evidence reviewed</i>	<p>Provincial</p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act • Private Managed Forest Land Act • Freedom of Information and Protection of Privacy Act • Natural Resources Compliance and Enforcement Database • Forest Practices Board Annual Reports • Determinations - Managed Forest Council (mfcouncil.ca) • Inquiries & Complaints - Managed Forest Council (mfcouncil.ca) 						
<i>Risk rating</i>	<table> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Low risk</td> </tr> <tr> <td>Other Private Land</td> <td>Low risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Low risk	Other Private Land	Low risk
Crown Land	Low risk						
Private Managed Forest Land	Low risk						
Other Private Land	Low risk						
4.2.6	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.						
<i>Findings</i>	<p>Scale of assessment</p> <p>Crown Land</p> <p>Private Managed Forest Land</p>						

Other Private Land

Analysis

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 exercised through representatives of their own choosing and in a manner consistent with their own customs, values, and norms.” This Indicator evaluates if 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 British Columbia (BC), Indigenous people identify as First Nations, Métis, Inuit or multiple Indigenous ethnicities. The collective term is Indigenous Peoples unless stated otherwise. 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 BC.

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

Federal

- Constitution Act, 1982, section 35
- UN Declaration on the Rights of Indigenous Peoples Act
 - Truth and Reconciliation Commission (TRC)’s Calls to Action

Historic Treaties

- Douglas Treaties
- Treaty #8

These treaties were made between the First Nations and the British Crown, before the province of British Columbia (BC) was established.

Modern Treaties

There are four modern treaties with eight First Nations:

- Nisga’a Final Agreement
- Tsawwassen Final Agreement
- Maa-nulth Final Agreement (five member First Nations)
- Tla’amin Final Agreement Provincial
- Declaration on the Rights of Indigenous Peoples Act (DRIPA)
- Forest Act
- Forest and Range Practices Act (FRPA)
- Forest Planning and Practices Regulation (FPPR)

Enforcement and monitoring

Annex 1 Detailed findings for Supply Base Evaluation

Section 35 of the Constitution Act, 1982 recognises and affirms the existing Aboriginal and treaty rights of the Indigenous Peoples of Canada. The federal government is responsible for the well-being of Indigenous Peoples. 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 British Columbia (BC). The BC Declaration of the Rights of Indigenous Peoples Act (DRIPA) and the Declaration Act Action Plan provide the basis for implementing consultation and accommodation on policy and regulation. DRIPA includes the phrase "free, prior and informed consent." 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"***

Modern treaty agreements include language on how consultation is to be undertaken. The modern-day treaties contain dispute resolution mechanisms. Parties could utilise the courts, should the mechanisms outlined in a treaty not bring about a resolution. BC Ministry of Forests (FOR) is responsible for consultation process regarding the implementation of forest management. FOR delegate some of the procedural steps to the proponent. The first phase of the consultation process occurs during the development of the Forest Stewardship Plan (FSP) by the licensee where information gathering, plan preparation, and review and comment are conducted. FOR supports the forest company, reviews the process, and approves the content of the FSP. Indigenous Peoples participate in the process as well as through any on-going relationships with the proponent and FOR. FSPs are approved by FOR in accordance with the Administrative Guide for Forest Stewardship Plans. The second phase of consultation occurs during the operational or implementation phase, when the proponent engages with Indigenous Peoples with an interest in the areas of proposed operations. The parties review planned areas of operations and consider the potential for Indigenous values to be affected by those operations. If there is a risk to Indigenous values, the operation may be modified. This consultation is referred to as the information sharing phase and usually occurs within six months of proposed harvesting. Procedures for information sharing include Building Relationships with First Nations: Respecting Rights and Doing Good Business (2014), Guide to Involving Proponents when Consulting First Nations (2014), and Updated Procedures for Meeting Legal Obligations When Consulting First Nations (2010). Once these discussions are complete, a proponent will apply for a cutting permit. FOR reviews the proponent's proof of information sharing correspondence and classifies if the application falls into three categories: Full permission from the Indigenous People(s), Potential issues identified by the Indigenous People(s), or Extensive issues identified by the Indigenous People(s). The assigned classification will determine if FOR engages in further consultation. FOR will only issue a cutting permit once it has determined that there is no risk of violation of the traditional rights of Indigenous peoples. First Nations enter into a Consultation and Revenue Sharing Agreement with the BC Ministry of Indigenous Relations and Reconciliation. Consultation is governed by the process and guidelines set out in the Agreement. The agreements generally contain a map of the traditional territory of the First Nation and the Agreement applies to proposed forest operations and management decisions made that affect or take place in the territory. The revenue shared is intended to help offset the First Nation's cost of consultation and to provide a degree of accommodation to offset any negative impacts from forestry. As of March 2024, there is no publicly available information regarding engagement or consultation processes between Indigenous Peoples and private managed forest land or other private land.

The BC Ministry of Indigenous Relations and Reconciliation is responsible for the implementation of the Declaration Act Action Plan. FOR is required to consult with Indigenous communities of forestry projects and policies that may impact Indigenous rights. The Ministry of Indigenous Relations and Reconciliation facilitates and supports these consultations to ensure compliance with legal and policy requirements. FOR is responsible for reviewing and approving FSPs. A part of the approval process is determining the adequacy of consultation. If FOR deems consultation to be insufficient or inadequate, the licensee can be required to undertake additional steps to reach an adequate

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	<p>level of consultation. The Forest Practices Board provides oversight regarding the implementation of policy direction on Crown land, including assessments of the effectiveness of aspects in the forest management regime related to Indigenous peoples and their rights and values. As of March 2024, there is no publicly available information regarding consultation oversight between Indigenous People(s) and owners of private managed forest land or other private land.</p> <p>As of March 2024, there is no publicly available information on free, prior and informed consent (FPIC) agreements in place with any First Nation or Métis organisation in BC. FOR assesses the consultation that has occurred between a forestry company and Indigenous Peoples and does not issue a cutting permit unless it has deemed that sufficient consultation and accommodation had occurred. As of March 2024, there is no publicly available information regarding consultation requirements on private managed forest land and other private land.</p> <p>Risk conclusion and justification</p> <p>In alignment with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), The BC Declaration of the Rights of Indigenous Peoples Act (DRIPA) 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 Low risk for Crown land in British Columbia. 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 British Columbia</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • 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 • Consultation notices, opportunities, meeting minutes, records, and outcomes, including accommodation, if applicable • Publicly available information (reports, news & websites) • Interviews with regulatory/oversight agency • Interview with Indigenous People • Interview with experts
<p><i>Evidence reviewed</i></p>	<p><u>International</u></p> <ul style="list-style-type: none"> • UN Declaration on the Rights of Indigenous Peoples <p><u>Federal</u></p> <ul style="list-style-type: none"> • Constitution Act, 1982, section 35

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	<ul style="list-style-type: none"> • UN Declaration on the Rights of Indigenous Peoples Act <p><u>Bi-lateral</u></p> <ul style="list-style-type: none"> • Maa-nulth Final Agreement • Nisga'a Final Agreement • Tla'amin Final Agreement • Tsawwassen Final Agreement • Boston Bar First Nation Forest and Range Consultation and Revenue Sharing Agreement with the Province of British Columbia <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Administrative Guide for Forest Stewardship Plans (FSPs). Vol 1. Preparation and Approval of an FSP. Ver 2.1 August 2009. • Building Relationships with First Nations: Respecting Rights and Doing Good Business, Province of British Columbia. 2014. • Declaration Act Action Plan • Declaration on the Rights of Indigenous Peoples Act • Declaration on the Rights of Indigenous Peoples Act Annual Report 2020-21. • Declaration on the Rights of Indigenous Peoples Act Annual Report 2021-22. • Forest and Range Practices Act • Forest Planning and Practices Regulation • Guide to Involving Proponents when Consulting First Nations, Province of British Columbia. 2014. • Mandate Letter for the Minister of Indigenous Affairs and Reconciliation, 7 December 2022 • Updated Procedures for Meeting Legal Obligations When Consulting First Nations, Province of British Columbia. 2014. 						
<i>Risk rating</i>	<table border="0"> <tr> <td>Crown Land</td> <td>Low risk</td> </tr> <tr> <td>Private Managed Forest Land</td> <td>Specified risk</td> </tr> <tr> <td>Other Private Land</td> <td>Specified risk</td> </tr> </table>	Crown Land	Low risk	Private Managed Forest Land	Specified risk	Other Private Land	Specified risk
Crown Land	Low risk						
Private Managed Forest Land	Specified risk						
Other Private Land	Specified risk						
4.2.7	Designated cultural heritage sites shall be preserved.						
<i>Findings</i>	<p>Scale of assessment Provincial</p> <p>Analysis 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 recognised as a cultural heritage site.</p>						

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	<p>Cultural heritage sites 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.</p> <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Heritage Conservation Act <p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest Range and Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) <p>Enforcement and monitoring</p> <p><u>Provincial</u></p> <p>The Heritage Conservation Act (HCA) protects archaeological sites on public and private land, regardless of whether they have been previously recorded or disturbed, and what site features are present. Construction, renovations, and landscaping can damage and destroy an archaeological site. Property owners have a legal responsibility to ensure archaeological sites are not disturbed without appropriate permits in place.</p> <p>The Heritage Conservation Act is administered by the British Columbia (BC) Ministry of Forests (FOR) Archaeology Branch. Archaeological sites and culturally modified trees (prior to 1846) are protected under the Heritage Conservation Act whether known or unrecorded, by having historical or archaeological value or designated as a Provincial Heritage Site. The Heritage Conservation Act empowers FOR to designate sites that meet relevant criteria for historic and cultural importance as a Provincial Heritage Site. The Archaeology Branch of FOR is responsible for maintaining the Provincial Heritage Register of known sites and available spatial assessment potential models. Archaeological information about a property or area can be requested by private property owners, industry, and Indigenous, local or provincial governments. The service is free of charge. There are information sharing terms and conditions associated with the archaeological information request. The Heritage Conservation Act Permitting Process Policy Guide is publicly available to determine if archaeological studies are required prior to a development, and how to apply for Heritage Conservation Act permits.</p> <p>The Heritage Conservation Act prohibits the disturbance of a wide range of cultural sites and artifacts, unless a permit has been issued. The Heritage Conservation Act and registry are applicable to Crown land, private managed forest land and other private land in BC.</p> <p>Risk conclusion and justification</p> <p><u>Provincial</u></p> <p>The Heritage Conservation Act (HCA) protects archaeological sites on public and private land, regardless of whether they have been previously recorded or disturbed, and what site features are present. Property owners have a legal responsibility to ensure archaeological sites are not disturbed without appropriate permits in place. Therefore, the risk for this indicator is low at the provincial level.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> • Regulatory framework • Regulatory agency websites • Forest management plans • Best management practices and/or operational procedures • Regulatory compliance and enforcement data/reports

Annex 1 Detailed findings for Supply Base Evaluation

<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> • Oversight agency database records and/or reports • Designated cultural heritage sites identified • 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 <p>Provincial</p> <ul style="list-style-type: none"> • Archaeology in British Columbia: A Guide for Property Owners and Developers • BC Archaeology Branch – Archaeological Studies and Permits (2023) • Forest Act • Forest and Range Evaluation Program Cultural Heritage Monitoring • Forest and Range Practices Act • FREP Dashboard • Heritage Conservation Act • Heritage Conservation Act Permitting Process Guidance 2020 • Ministry of Forests Compliance and Enforcement Branch Annual Report 2022-2023 • Ministry of Forests Forest and Range Evaluation Program (FREP) • Ministry of Forests Report finding an archaeological artifact or human remains • Report a contravention - Province of British Columbia (gov.bc.ca)
<p><i>Risk rating</i></p>	<p>Provincial Low risk</p>

Annex 2 List of experts consulted and contacts of Working Body

Expert	Affiliation & role
BC First Nations Forestry Council	Lennard Joe, Chief Executive Officer
BC First Nations Forestry Council	Robert Manuel, Strategic Adviser
BC First Nations Forestry Council	Tiffany Butler-Hernandez, Policy Program Manager
BC Government, Ministry of Forests	Alvin Yanchuk, BC Tree Breeding Program lead
BC Government, Ministry of Forests	Jim Brown, Director, Forest Analysis and Inventory Branch
BC Government, Ministry of Forests	Warren Greeves, Manager
BC Government, Ministry of Forests, Office of the Chief Forester	Eric Nance, Policy Analyst, Forest Carbon and Climate Services
BC Government, Ministry of Forests, Office of the Chief Forester, ForestCarbon and Climate Services Branch	Garrett McLaughlin, A/ Technical Advisor, ForestCarbon
BC Labour Relations Board	
BC Ministry of Labour, Employment Standards Branch	
Managed Forest Council	Ann Donaldson, Executive Director
Ministry of Forests, Forest Carbon and Climate Services Branch	Qinglin Li
Ministry of Forests, Forest Carbon and Climate Services Branch	Xin Yuan, Manager, Forest Carbon and Climate Services
NRCAN	Andrew Dyk, Deforestation Coordinator
NRCAN	Ben Hudson, Manager, Carbon Accounting and Reporting
Worksafe BC	Darcy Moshenko, OHS Consultant, Forestry, OHS Consultation&Education Services

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

Working Body for the preparation of the Public Consultation Draft (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. 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.

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

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. 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

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

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

Publications used

International

- All POPs listed in the Stockholm Convention
- Convention on International Trade in Endangered Species of Wild Fauna and Flora
- European Commission – Commission notice on technical guidance on the classification of waste
- European Union’s Renewable Energy Directive 2018/2001 (REDII)
- Forest Legality Initiative. Laws & Policies.
- Global Forest Watch
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- International Labour Organization. About the International Programme on the Elimination of Child Labour.
- International Labour Organization. C001 - Hours of Work (Industry) Convention. 1919.
- International Labour Organization. C100 - Equal Remuneration Convention. 1951.
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- International Labour Organization. Canada Freedom of association cases.
- International Labour Organization. Child Labour Country Dashboard.
- International Labour Organization. Child Labour.
- International Labour Organization. Committee on Freedom of Association.
- International Labour Organization. Complaints.
- International Labour Organization. Fair Recruitment Initiative.
- International Labour Organization. Freedom of Association.
- International Labour Organization. How the ILO Works.
- International Labour Organization. International Labour Standards on Collective Bargaining.
- International Labour Organization. International Labour Standards on Freedom of Association.
- International Labour Organization. Mission and Impact of the ILO.
- International Labour Organization. Q & A on Business and Forced Labour.
- International Labour Organization. Ratifications for Canada.

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- International Labour Organization. What are forced labour, modern slavery and human trafficking?.
- International Labour Organization. What is collective bargaining.
- International Trade Union Confederation. 2023 Global Rights Index. 2023
- IUCN Globally Threatened Ecosystems
- Korea Forest Service. Korea’s regulation to promote legal timber trade.
- Maplecroft. Child Labour Index. 2014.
- NatureServe Conservation Status categories
- Nature Serve Canada
- 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. REDIIBIO final report. February 2021.
- NepCon. Basic EUTR: How to Get Started.
- PAN International Consolidated List Of Banned Pesticides
- Rotterdam Convention Annex III Chemicals
- Shape of Nature Globally threatened ecosystems
- Sustainable Biomass Program Standards Glossary Version 2.0
- The Paris Agreement
- Timber Trade Portal. Japan Clean Wood Act.
- UN Declaration on the Rights of Indigenous Peoples
- United Nations Children’s Fund. Child Labour. 2022.
- United Nations Children’s Fund. Implementing and monitoring the Convention on the Rights of the Child.
- United Nations. Committee on the Elimination of Racial Discrimination.
- United Nations. Committee on the Rights of the Child.
- United Nations. Freedom of assembly and association.
- United Nations. Human Rights Council-mandated Investigative Bodies.
- United Nations. Ratifications for Canada.
- United Nations. Special Rapporteur on contemporary forms of slavery.
- United Nations. Special Rapporteur on freedom of peaceful assembly.
- United Nations. Universal Declaration of Human Rights
- Walkfree. Global Slavery Index. 2018.
- World Business Council on Sustainable Development Circular bioeconomy: The Business Opportunity Contributing to a Sustainable World.
- World Economic Forum. Global Gender Gap Report 2021: Insight Report. 203.

Federal

- 2020 Wild Species Report
- Canada Employment Insurance Commission.

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- Canada Employment Insurance Commission. 2020/2021 Employment Insurance Monitoring and Assessment Report.
 - Canada Health Act
 - Canada health care system.
 - Canada National Parks Act
 - Canada Pension Plan
 - Canada's National Deforestation Monitoring System: System Description 2015
 - Canada's Nationally Determined Contribution
 - Canadian Council of Ministers of the Environment Air Website
 - Canadian Environmental Protection Act
 - Canadian Food Inspection Agency – FIA - Division 28 (Novel Foods) section of the Food and Drug Regulations C.R.C., c. 870
 - Canadian Foundation of Labour Rights. Restrictive Laws.
 - Canadian Human Rights Commission. Homepage.
 - Canadian Human Rights Tribunal. Homepage.
 - Canadian Institute for Health Information. Homepage.
 - Canadian Justice Laws. The Constitution Acts. 1867 – 1982.
 - Canadian Labour Code Part II and regulations
 - Canadian Labour Congress. Chapters.
 - Canadian Legal Information Institute. Homepage.
 - Canadian Navigable Waters Act
 - Conference Board of Canada. Health Report Card. February 2015.
 - Constitution Act of 1867.
 - Constitution Act, 1982, section 35
 - Criminal Code of Canada
 - Criminal Justice. Human Trafficking.
 - Employment and Social Development Canada.
 - Employment and Social Development Canada. Request for reconsideration of an Employment Insurance decision.
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 - Environment and Climate Change Canada
 - Federal Air Quality Health Index
 - Fisheries Act
 - Genome Canada
 - Government of Canada. Prevailing Wages In Canada: Labourer, Logging and Forestry: British Columbia.
 - Government of Canada. Section 2(d) Freedom of Association
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- Government of Canada. Trade in protected species: relevant authorities.
- Hazardous Products Act and its Regulations
- Migratory Birds Convention Act
- Ministry of Forests. Forest Tenures.
- National Air Pollution Surveillance Program
- National Deforestation Monitoring System
- Natural Resources Canada – Research on the potential environmental impact of genetically modified trees
- Natural Resources Canada (NRCan). 2024. Forest carbon stocks calculated by the Carbon Budget Model of the Canadian Forest Sector.
- NCASI. Canadian Forestry Regulations and Standards. 2021.
- Old Age Security Act
- Pest Control Products Act
- Pest Control Products Incident Reporting Regulations
- Pest Control Products Regulations
- Pest Control Products Sales information Reporting Regulations
- Plant Protection Act
- Public Registry of Pest Control Products for Use in Canada
- Public Safety Canada. Human Trafficking National Coordination Centre
- Public Safety Canada. Human Trafficking.
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- Royal Canadian Mounted Police. Report Corruption.
- Seed Act
- Social Security Tribunal of Canada. Homepage.
- Species at Risk Act
- Species at Risk Public Registry
- Statistics Canada
- Statistics Canada. Discrimination before and since the start of the pandemic. 2022.
- Statistics Canada. Pay Gap 1998-2021.
- Statistics Canada. Trafficking in Persons in Canada. 2020.
- Statistics Canada. Union coverage by industry, monthly, unadjusted for seasonality.
- The State of Canada’s Forests Annual Report (2020)
- The State of Canada’s Forests Annual Report (2021)
- The State of Canada’s Forests Annual Report (2022)
- The State of Canada’s Forests Annual Report (2023)
- UN Declaration on the Rights of Indigenous Peoples Act

Annex 3 List of publications used

- Workplace Hazardous Materials Information System 2015

Provincial

- 2017 Managed Forest Inspection Program
- 2018 Integrated Pest Management Compliance Inspection Report
- 2018 Managed Forest Inspection Program
- 2019 Integrated Pest Management Compliance Inspection Report
- 2019 Managed Forest Inspection Program
- 2021 Managed Forest Inspection Program
- 2022 Managed Forest Inspection Program
- 2022 Summary of Forest Health Conditions in BC
- 2023 Managed Forest Inspection Program
- 2023-2026 Forest Health Strategic Plan
- A New Future for Old Forests A Strategic Review of How British Columbia Manages for Old Forests Withing its Ancient Ecosystems
- ABCFP Practice Review Annual Report 2019
- ABCFP Practice Review Annual Report 2020
- Accounts and Measures for Managing Identified Wildlife
- Administrative Guide for Forest Stewardship Plans (FSPs). Vol 1. Preparation and Approval of an FSP. Ver 2.1 August 2009.
- Air Quality Health Index
- Allowable Annual Cut – Timber Supply Areas
- Allowable Annual Cut – Tree Farm Licences
- Allowable Annual Cut for First Nation Forest Licences
- Annual Timber rents and fees
- Archaeology in British Columbia: A Guide for Property Owners and Developers
- Assessment Act
- Assistant Deputy Minister Resource Stewardship Report: Regional Results of the Forest and Range Evaluation Program (2019)
- Assistant Deputy Minister’s Resource Stewardship Report (2016/17)
- BC Ambient Air Quality Objectives Fact Sheet
- BC Archaeology Branch – Archaeological Studies and Permits (2023)
- BC Community Forest Association
- BC Ecological classification system
- BC Endangered Species list (includes ecosystems) and mapping tool
- BC Forest Carbon initiative
- BC Forest Safety Council
- BC Forest Safety Council Annual Reports

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- BC Forest Safety Council SAFE Certified Company Listing
- BC government Interior Log Market reports
- BC Government Response to FPB/SIR/40
- BC Ministry of Forests 2021 Economic State of British Columbia’s Forest Sector
- BC Ministry of Forests. 2022 Economic State of British Columbia's Forest Sector
- BC Office of Ombudsperson. Annual Report. 2022/2023.
- BC Office of Ombudsperson. Village of McBride.
- BC Office of the Ombudsperson. Homepage.
- BC Provincial Parks
- BC Report a Spill Website
- BC Species at Risk listing and Critical Habitat identification
- BC Spill Incidents Website
- BC Timber Pricing
- Board of Scaling Examiners – Examination Standards (July 2014)
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- British Columbia Employment Standards Tribunal. Annual Reports.
- British Columbia Employment Standards Tribunal. Homepage.
- British Columbia Human Rights Tribunal. Annual Reports.
- British Columbia Human Rights Tribunal. Homepage.
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- British Columbia Labour Relations Board. 2022 Annual Report. 2022
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- British Columbia Labour Relations Board. Collective Bargaining Agreements.
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- British Columbia Labour Relations Board. Homepage.
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- British Columbia Office of the Human Rights Commissioner. Sparking Change 2022/23 and Service Plan 2023/24 to 2025/26. 2022/23.
- British Columbia’s Office of the Human Rights Commissioner. Homepage.
- Building Relationships with First Nations: Respecting Rights and Doing Good Business, Province of British Columbia. 2014.
- Burn Registration
- Chief Forester Forest Management Options for Reducing Slash Pile Burning: Best Management Practices
- Chief forester stocking guidelines

Annex 3 List of publications used

- Chief Forester's Guidance on Coarse Woody Debris Management
- Coastal Appraisal Manual
- Commercial Transport Act
- Concurrent Residual Harvest System (Coast)
- Concurrent Residual Harvest System (Interior)
- Contact B.C. Air Quality Regarding Air Quality Complaints
- Declaration Act Action Plan
- Declaration on the Rights of Indigenous Peoples Act
- Declaration on the Rights of Indigenous Peoples Act Annual Report 2020-21.
- Declaration on the Rights of Indigenous Peoples Act Annual Report 2021-22.
- Description of enabling legislation for Species at risk
- Determinations - Managed Forest Council (mfcouncil.ca)
- Drinking Water Protection Act
- Drinking Water Sources (Surface Water PODs) - Datasets - Data Catalogue
- Ecosystem mosaic protection in wildlife management areas
- EFlora BC Atlas- searchable database- interactive database, map and photos
- Employment Standards Act
- Environment and Land Use Act
- Environmental Compliance Reports Air Quality Data
- Environmental Management Act and Regulations
- Forest Act and Regulations
- Forest and Range Evaluation Program Cultural Heritage Monitoring
- Forest and Range Practices Act
- Forest and Range Practices Amendment Act
- Forest Carbon Initiative
- Forest Genetics
- Forest Health Strategies
- Forest landscape plans
- Forest Planning and Practices Regulation
- Forest Practices Board
- Forest Practices Board - BC Timber Sales Program
- Forest Practices Board 2020/2021 Annual Report
- Forest Practices Board Annual Reports
- Forest Practices Board Glossary

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- Forest Practices Board. Community Watersheds: From Objectives to Results on the Ground. A Special Investigation. FPB/SIR/40. April 2014.
- Forest Practices Board. Forest Practices and Water. Opportunities for Action. Special Report. FPB/SR/60. January 2022.
- Forest Practices Board. Forestry Activities in the Peachland and Trepanier Creek Community Watersheds. Complaint Investigation #17046. FPB/IRC/224. September 2019.
- Forest Practices Board. Watershed Assessment in the Glade Community Watershed. Complaint Investigation #18045. FPB/IRC/232. July 2020.
- Forest Professionals of British Columbia 2021 Professional Conduct Audit Report
- Forest Professionals of British Columbia Bylaws
- Forest Professionals of British Columbia Code of Ethical and Professional Conduct
- Forest Professionals of British Columbia Competence Audit Annual Report 2021
- Forest Professionals of British Columbia Professional Forestry Practice Areas
- Forest Professionals of British Columbia Registrant Audits Summary Report 2022
- Forest Professionals Regulation
- Forest Protection and Practices Regulation
- Forest Statutes Amendment Act
- Forest Stewardship Plans
- Forests and Range Practices Act
- FPB 2019 Report
- FPB Annual Report 2018-2019
- FPB Annual Report 2019-2020
- FPB Annual Report 2020-2021
- FPB Annual Report 2021-2022
- FPB Annual Report 2022-2023
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- Freedom of Information and Protection of Privacy Act
- FREP Dashboard
- FREP Protocol for Cultural Heritage Resource Stewardship Monitoring
- FREP Report # 42. Water Quality Effectiveness Evaluation. Water Quality Data Summary for 2008 – 2020.
- FREP: Forest and Range Evaluation Program. Field Guide for Stand-level Biodiversity Monitoring (2008)
- Government Actions Regulation
- Government of British Columbia WorkBC. Logging and Forestry Labourers - Wages and Salaries.
- Government of British Columbia. Employment Standards.
- Guide to Involving Proponents when Consulting First Nations, Province of British Columbia. 2014.
- Harvest Billing System
- Health Professionals and Occupations Act

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- Heritage Conservation Act
- Heritage Conservation Act Permitting Process Guidance 2020
- Human Rights Code
- Human Rights Commission. Homepage.
- Human Rights Tribunal. Homepage.
- Identified Wildlife Management Strategy
- Indigenous protected and conserved areas
- Inquiries & Complaints - Managed Forest Council (mfcouncil.ca)
- Integrated Pest Management Act
- Integrated Pest Management Regulation
- Interest Disclosure Act
- Interior Appraisal Manual
- Invasive Plants Regulation
- Labour Relations Code
- Land Act
- Land Titles Act
- Local Government Act
- Logging Tax Act
- Maa-nulth Final Agreement
- Managed Forest Council
- Managed Forest Council Annual Report 2022-23
- Managed Forest Council Annual Reports 2017-2022
- Mandate Letter for the Minister of Indigenous Affairs and Reconciliation, 7 December 2022
- Mapping of the Interior Wetbelt Forests and Interior Temperate Rainforests
- Medicare Protection Act
- MFC Field Practices Guide
- Mineral Tenure Act
- Minimum Stumpage Rate Regulation
- Ministry of Environment and Climate Change Strategy Air Zone Reports
- Ministry of Environment and Climate Change Strategy Compliance and Enforcement Policy and Procedure
- Ministry of Environment and Climate Change Strategy Environmental Compliance Reports
- Ministry of Environment and Climate Change Strategy Environmental Compliance Reports (2021 – 2023)
- Ministry of Environment and Climate Change Strategy Measuring Air Quality
- Ministry of Environment and Climate Change Strategy Smoke and Burning Regulations and Bylaws.

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- Ministry of Forests Compliance and Enforcement Branch Annual Report 2022-2023
- Ministry of Forests Forest and Range Evaluation Program (FREP)
- Ministry of Forests Forestry Pesticide Applicator Certificate
- Ministry of Forests Integrated Resource Monitoring
- Ministry of Forests Kamloops Timber Supply Area Timber Supply Review Data Package – Update. Sept 2015.
- Ministry of Forests Okanagan Timber Supply Area Timber Supply Review Data Package – December 2017
- Ministry of Forests Pesticide Certification and Training
- Ministry of Forests Report finding an archaeological artifact or human remains
- Ministry of Forests Silviculture statistics
- Ministry of Forests Trends in Timber Harvest in BC
- Ministry of Health. Homepage.
- Ministry of Labour. Employment Standards.
- Ministry of Labour. Employment Standards.
- Ministry of Labour. Hiring Young People.
- Ministry of Labour. Hours of work and overtime.
- Ministry of Labour. Investigations.
- Ministry of Labour. Make a complaint.
- Ministry of Labour. Working in BC.
- Motor Vehicle Act
- National Forestry Database
- National Parks in BC
- Natural Resource Compliance and Enforcement Database
- Natural Resource Compliance and Enforcement Reporting
- Natural Resource Compliance Reports and Statistics
- Nisga’a Final Agreement
- Occupational Health & Safety Regulation
- Office of the Superintendent of Professional Governance. Annual Report. 2022/23.
- Office of the Superintendent of Professional Governance. Homepage.
- OFTS Registered Burns and Prescribed Fire Map
- Old Growth Deferral Area
- Old Growth Strategic Review Process
- Ombudsperson Act
- Open Burning Smoke Control Regulation
- Park Act

Annex 3 List of publications used

- Personal Information and Protection Act
- Post natural disturbance retention guideline
- Priority Deferrals An Ecological Approach
- Private Forest Landowners Association
- Private Managed Forest Land Act
- Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013
- Private Managed Forest Land Council Regulation
- Private Managed Forest Land Regulation
- Professional Governance Act
- Provincial Inventory of Greenhouse Gas Emissions
- Provincial Logging Residue and Waste Measurement Procedures Manual – Coast Version
- Provincial Logging Residue and Waste Measurement Procedures Manual – Interior Version
- Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report
- Recovery Planning
- Regional forest health strategies
- Report a contravention - Province of British Columbia (gov.bc.ca)
- Residual Fibre Operational Support
- Residual Fibre Utilization (Fibre Recovery Process)
- Residual Fibre Utilization Policy
- Riparian Area Protection Regulations
- Riparian Areas Protection Act
- Scaling Manual
- Scaling Regulation
- Scaling Requirements in British Columbia (January 2018)
- Seed production
- Shared Priorities Framework between the Province of British Columbia and Members of the Alliance of BC Modern Treaty Nations
- Species at Risk Related Legislation
- Spills & Environmental Emergencies Website
- Taxation (Rural Areas) Act
- The 1999-2015 mountain pine beetle outbreak
- The Inland Temperate Rainforest and Interior Wetbelt Biomes of Western North America
- The State of British Columbia's Forests – Third Edition 2010
- Timber Marking and Transportation Regulation
- Timber Scaling Regulation

Annex 3 List of publications used

- Timber Supply Review & Allowable Annual Cut
- Timber Supply Review Backgrounder April 2021
- Tla'amin Final Agreement
- Trade and Invest BC BC Economic Regions
- Transport of Dangerous Goods Act
- Tree Farm Licence Allowable Annual Cut
- Tree Seed
- TSA Allowable Annual Cuts
- Tsawwassen Final Agreement
- Updated Procedures for Meeting Legal Obligations When Consulting First Nations, Province of British Columbia. 2014.
- Waste Assessments Policy
- Water Protection Act
- Water Sustainability Act
- Weed Control Act
- Weed Control Regulation
- Wildfire Act
- Wildfire History
- Wildfire Management Website
- Wildfire Regulation
- Wildfire Risk Reduction Pile Construction and Burning Guidance
- Wildlife Act
- Woodlot License Planning and Practices Regulation
- Workers Compensation Act
- Workers' Compensation Appeal Tribunal. 2022 Annual Report.
- Workers' Compensation Appeal Tribunal. Homepage.
- WorkSafe BC Annual Reports
- WorkSafe BC Certificate of Recognition Program (COR)
- WorkSafe BC Roles, Rights and Responsibilities
- WorkSafeBC OHS Guidelines
- WorkSafeBC. 2022 Annual Report and 2023-2025 Service Plan.
- WorkSafeBC. Homepage.
- WorkSafeBC. Review and Appeal.

Other

- BC Council of Forest Industries The Economic Impact of British Columbia's Forest Sector
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- BC's Old Growth Forest: A Last Stand for Biodiversity
 - Finlay A. McAlister, Peter Cram and Chaim Bell. Comparing Canadian health care to that in other countries: looking beyond the headlines. 2018.
 - GAN Integrity. Country Profiles – Canada. 05 November 2023.
 - Interpol. Global corruption in forestry sector worth USD 29 billion a year. 09 December 2016.
 - Organization for Economic Co-operation and Development. Corruption in the Extractive Value Chain. 2016.
 - Professional Standards Authority. An Inquiry into the performance of the college of Dental Surgeons of British Columbia and the Health Professions Act. December 2018.
 - Red-Listed Ecosystem Status of Interior Wetbelt and Inland Temperate Rainforest of British Columbia, Canada
 - Species at risk recovery in BC: and Audit of Federal and Provincial Actions
 - Sustainable Biomass Program. Guidance for SBP Standard 1: Feedstock Compliance. 28 April 2023.
 - Transparency International. Corruption in the Extractive Industries.
 - Transparency International. Country Data – Canada. 2022.
 - Wood Pellet Association of Canada Wood Pellet Location Map
 - World Bank. Interactive Data Access – Canada. 05 November 2023.
 - World Bank. Worldwide Governance Indicators – Overview.
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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	2
Certification scheme	4
Economic Interest	54
Environmental Interest	84
National and state forest agency	54
Research institution	5
Social Interest	239
Grand Total	442

Annex 5 Stakeholder consultation report

Stakeholder	Comment	Response
Certification Body	<p>Section 1 - Introduction</p> <p>General comment: Most of the figures/maps are low resolution and blurry, some are unreadable. It would be good to have higher resolution in the final product or maps products split into 2 figures if they are designed to communicate important aspects (which I think they are as sourcing context).</p>	<p>Thank you for your valuable feedback. The revised RRA will provide high-resolution figures and maps.</p>
	<p>Section 4 - Stakeholder consultation</p> <p>Section 4 is Regional Background in RRA: Section 4.2 figure 8 - there is no map.</p>	<p>Thanks for your comment. Figure 8 has been deleted.</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.</p>	<p>Thank you for your comment. We have updated the text to include a key piece of legislation that was previously missing for private land: the <i>Private Managed Forest Land Act</i>. The Private Managed Forest Land Program was established in 2003 under this Act, through which landowners voluntarily commit to managing their properties for long-term forest production. The program includes the protection of five key environmental values: forest regeneration, soil conservation, drinking water quality, fish habitat, and critical wildlife habitat.</p> <p>However, it is important to note that only approximately 40% of private managed forest land is enrolled in the program. Despite the environmental protection measures outlined, the management of logging residues is not explicitly addressed. Additionally, landowners may choose to exit the program at their discretion, subject to an exit fee. Therefore, we have changed the risk rating from low risk to specified risk for private lands.</p>
Certification scheme	<p>General Comments:</p> <p>The only experts consulted were the BC First Nations Forestry Council.</p> <p>PEFC Canada expresses significant concern that the regional risk assessment procedure lacks sufficient guidance to ensure the development of a consistent</p>	<p>SBP requests the WB to fulfil requirement 5.4 of the RRA Procedure. The requirement described the objective of the public consultation in term of reach. This includes Indigenous peoples. The WB must demonstrate to SBP</p>

Annex 5 Stakeholder consultation report

	<p>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 limited evidence of involvement of Indigenous Peoples in the engagement process as the only experts consulted were the BC First Nations Forestry Council. 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>how this objective is met. This is one of the control points SBP reviews before the validation of any RRA.</p> <p>SBP nor the Working Body publishes list of the organisations reached out during the public consultation for obvious confidentiality reasons.</p>
	<p>Section 1 - Introduction</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 British Columbia 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>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. The SBP risk assessment could have been streamlined (consistent with SBP Standard 2) by recognizing fibre sourced through existing certifications as compliant with its requirements.</p> <p>This approach would reduce redundancy, particularly given that most of BC'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> <p>Most of BC's forest land base is already certified under SFM standards (FSC and two PEFC-endorsed standards: CSA and SFI), and most forest companies</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>

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	<p>possess CoC certification and/or fibre sourcing certification which addresses risk of sourcing fibre from unacceptable sources.</p> <table border="1"> <tr> <td data-bbox="456 245 728 268">Processing residues</td> <td data-bbox="728 245 1019 438"> <p>Not certified to an SBP-recognised certification scheme</p> </td> <td data-bbox="1019 245 1272 438"> <p>Evidence to prove 'processing residues' feedstock category; AND SBE + Risk Management for specified risks OR RRA + Risk Management for specified risks</p> </td> </tr> <tr> <td></td> <td data-bbox="728 438 1019 576"> <p>Certified to an SBP-recognised certification scheme</p> </td> <td data-bbox="1019 438 1272 576"> <p>Evidence to prove 'processing residues' feedstock category; and that the feedstock is certified by an SBP-recognised certification scheme</p> </td> </tr> </table> <p>3.3 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> <ol style="list-style-type: none"> Supply Base Verifiers (SBVs) (see section 5 below) and/or Risk Assessment and Risk Ratings (see section 6 below) and/or Risk Management Plan (RMP) containing Risk Management Measures (RMM) (see section 7 below). 	Processing residues	<p>Not certified to an SBP-recognised certification scheme</p>	<p>Evidence to prove 'processing residues' feedstock category; AND SBE + Risk Management for specified risks OR RRA + Risk Management for specified risks</p>		<p>Certified to an SBP-recognised certification scheme</p>	<p>Evidence to prove 'processing residues' feedstock category; and that the feedstock is certified by an SBP-recognised certification scheme</p>	
Processing residues	<p>Not certified to an SBP-recognised certification scheme</p>	<p>Evidence to prove 'processing residues' feedstock category; AND SBE + Risk Management for specified risks OR RRA + Risk Management for specified risks</p>						
	<p>Certified to an SBP-recognised certification scheme</p>	<p>Evidence to prove 'processing residues' feedstock category; and that the feedstock is certified by an SBP-recognised certification scheme</p>						
	<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 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>Thank you for your valuable feedback. In order to ensure a rigorous process and harmonisation between countries, SBP conducts RRA at regional level irrespective of existing assessment and certification schemes.</p> <p>We acknowledge your comments on national versus regional assessment, and SBP will evaluate whether a national Risk Regional Assessment would be meaningful and aligned with our processes.</p>						

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	<p>Section 3 - Methodology</p> <p>Proof-reading: The document requires more thorough proofreading. For instance, Section 3.1 references the RRA-AB, raising concerns that the document may have been adapted from the Alberta RRA and could potentially contain errors. Section 3.1 (p. 11)-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.</p>	<p>The revised version will undergo a final review before final publication. The reference to the RRA Alberta has been corrected</p> <p>You are correct regarding the comment regarding indicator 1.1. Given the rigorous legal framework governing forestry in Canada (both provincial and federal), we are currently working on developing A generic and simplified text to ensure consistency across different RRAs while still reflecting Canada's strong legal framework for forestry This text will be included in the revised version of the RRA.</p> <p>Unnecessary or not specific references to BC in Annex.1 will be deleted to simplify the text</p> <p>We agree with you that the overview in Section 4 is too long and that some elements presented here could be used for different indicators.</p>
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Table 1: Information Gathering Requirements

	Information Gathered – by Sub-scope
Regulatory Framework	Acts, Regulations, policy, and/or required best management practices specific to the threat/impact to the Indicator.
Implementation Mechanisms	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.
Oversight Framework	Enforcement and/or monitoring framework of Acts, Regulations, policy, and/or required best management practices specific to the threat/impact to the Indicator.
Results	Verification of a compliance/enforcement and/or monitoring framework. Quantifiable or qualifiable results of current condition, including but not limited to: <ul style="list-style-type: none"> • Monitoring results • Inventory &/or analysis • Compliance & enforcement results • Assessment reports • External agency reports • Publicly available data and/or websites • Expert &/or Stakeholder information/results

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 Regional Background (p.18) 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 BC included in 4.2 Ecological Overview. Much of the information in this section could be deleted 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. 46) 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. 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. It is not clear that the risk assessment considered the guidance provided in either of the related SBP Guidance documents as there is a considerable amount of extraneous commentary provided in the tables. For example, Indicator 1.1.1

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	<p>(p. 50) includes the statement: 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. This statement is unnecessary and is but one example of this extraneous commentary. In most cases, the potential threats/impacts are not clearly identified or specific to the indicator and the scope of the assessment. For example, again Indicator 1.1.1 (p. 50), rather than describing the situation specific to BC, describes the threat as follows: In regions where there is a high risk</p>	
	<p>Section 4 – Stakeholder consultation</p> <p>The lack of stakeholder comments on the previous version of the RRA highlights a significant concern regarding 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 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. For comparison, the FSC NRA process allows a 60-day period, providing a more reasonable timeframe for meaningful input.</p>	<p>Thank you for your comment which we will consider as part of the lessons learnt from this series of RRA development.</p>
	<p>Section 5 – Conclusions</p> <p>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>The conclusion is currently a summary table showing the risk level for each indicator. We agree that more information could be added. The revised version will add text to ensure the table is useful and provide mitigation measures for each specific risk.</p>
	<p>Annex 1</p> <p>Annex 1: Detailed findings for indicators (p. 46) Format of Risk Assessment:</p> <p>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</p>	<p>On the basis of your comments and those of the other organizations consulted, we have removed the unnecessary references and reduced the text accordingly.</p>

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	<p>with the assessment and the process. However, this is not an exhaustive list of the weaknesses that we have identified. It is not clear that the risk assessment considered the guidance provided in either of the related SBP Guidance documents as there is a considerable amount of extraneous commentary provided in the tables. For example, Indicator 1.1.1 (p. 50) includes the statement: 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. This statement is unnecessary and is but one example of this extraneous commentary. In most cases, the potential threats/impacts are not clearly identified or specific to the indicator and the scope of the assessment. For example, again Indicator 1.1.1 (p. 50), rather than describing the situation specific to BC, describes the threat as follows: 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. In the same example, the analysis includes a section, "Means of Verification", which refers to organizational level documents/controls such as chain of custody or fibre procurement procedures, supplier verification program, interviews with workers. None of this relates to assessing the risk at a provincial level. Further, there is no clear linkage between the regulatory framework, the means of verification, the evidence, the results and the conclusions.</p> <p>Following are some of our specific comments on the risk assessment. In general, the sub-scope designations need to be rethought and/or the certification status of the forest area considered in the analysis. The findings and the risk assessments need to be separated out into certified vs uncertified for both Crown land and Private Managed Land as the implementation mechanism, and therefore risk, are different between certified and uncertified. The analysis should consider the type of SFM certification, and the level of public reporting required. For example, CSA, SFI, and FSC require public reporting of thirdparty audit results which should address Indicators 2.1.3, 2.2.1, 3.2.3, 4.1.8. 4.2.7. Indicator 1.1.5 (p. 64)- Mining does not appear to</p>	
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	<p>be addressed in the risk assessment even though mining activity can have a significant impact on the forest land base in certain areas of the province.</p> <p>Indicators 2.1.1 and 2.1.2 (p. 73-85)- Implementation mechanisms and results sections do not fully address how stand level biodiversity is implemented, i.e. through planning activities at the site or block level (harvesting, roads, silviculture). And nowhere in the indicators does it speak to mining impacts on biodiversity. The means of verification and evidence only deal with these indicators at the landscape level, not the stand level or species level. The results in indicators 2.1.2 and 3.2.3 should have been more specific as to what values (ecosystems, species, etc.) in the supply area are at risk. This needs to be done at an ecoregion level for HCVs and also SAR. Better analysis of IFLs is need and specified risk assigned specifically to those IFLs that are at risk.</p> <p>Evidence:</p> <p>The evidence reviewed sections in the detailed analyses include documents that are not evidence and do not support the conclusions, e.g. Sustainable Biomass Program. Guidance for SBP Standard 1: Feedstock Compliance. 28 April 2023, or are not relevant to the scope of the indicator, e.g. Provincial Inventory of Greenhouse Gas Emissions (Indicator 2.2.6). Evidence should be specific to the indicator and demonstrate the status of the indicator. Including irrelevant information in the analyses does not support the conclusions of the risk assessment.</p>	
	<p>Annex 2 – List of experts consulted and contacts of Working Body</p> <p>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 limited 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</p> <p>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>

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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. Furthermore, it is not clear if Indigenous groups have been adequately identified and consulted.</p> <p>5.10 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>6.4 SBP public stakeholder consultation</p> <p>6.4.1 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. For example, the assessment of legality is flawed as a timbermark 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>
	<p>Indicator 1.1.1</p> <p>It is not clear that the risk assessment considered the guidance provided in either of the related SBP Guidance documents as there is a considerable amount of extraneous commentary provided in the tables. For example, Indicator 1.1.1 (p. 50) includes the statement:</p> <p>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</p>	<p>Thank you for your comments. On the basis of your comments and those of the other organizations consulted, we have removed the unnecessary references and reduced the text accordingly.</p>

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	<p>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.</p> <p>This statement is unnecessary and is but one example of this extraneous commentary.</p> <p>In most cases, the potential threats/impacts are not clearly identified or specific to the indicator and the scope of the assessment. For example, again Indicator 1.1.1 (p. 50), rather than describing the situation specific to BC, describes the threat as follows:</p> <p>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.</p> <p>In the same example, the analysis includes a section, “Means of Verification”, which refers to organizational level documents/controls such as chain of custody or fibre procurement procedures, supplier verification program, interviews with workers. None of this relates to assessing the risk at a provincial level.</p> <p>Further, there is no clear linkage between the regulatory framework, the means of verification, the evidence, the results and the conclusions .</p> <p>Please note that this is one example of issues with the risk assessment, but it broadly applies to the entire process.</p>	
	<p>Indicator 1.1.5</p> <p>Indicator 1.1.5 (p. 64)- Mining does not appear to be addressed in the risk assessment even though mining activity can have a significant impact on the forest landbase in certain areas of the province.</p>	<p>Mining activities and regulations are part of the assessment process. The risk analysis demonstrated that is no illegal mining in BC and does impact forest activities</p>
	<p>Indicator 2.1.1</p> <p>Indicators 2.1.1 and 2.1.2 (p. 73-85)-Implementation mechanisms and results sections do not fully address how stand level biodiversity is implemented, i.e. through planning activities at the site or block level (harvesting, roads, silviculture). And nowhere in the indicators does it speak to mining impacts on biodiversity. The means of verification and evidence only deal with these indicators at the landscape level, not the stand level or species level.</p>	<p>The scale and scope of the analysis for this indicator is at the provincial level in all RRAs in Canada and around the world, in line with SBP requirements.</p>

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	<p>Indicator 2.1.2</p> <p>The results for indicator 2.1.2 should have been more specific as to what values (ecosystems, species, etc.) in the supply area are at risk. This needs to be done at an ecoregion level for HCVs and also SAR. Better analysis of IFLs is need and specified risk assigned specifically to those IFLs that are at risk.</p>	<p>The analysis scale and scope for this indicator is standard for all RRAs in Canada and around the world, in line with SBP requirements.</p>
	<p>Indicator 2.1.3</p> <p>In general, the sub-scope designations need to be rethought and/or the certification status of the forest area considered in the analysis. The findings and the risk assessments need to be separated out into certified vs uncertified for both Crown land and Private Managed Land as the implementation mechanism, and therefore risk, are different between certified and uncertified. The analysis should consider the type of SFM certification and the level of public reporting required. For example CSA, SFI, and FSC require public reporting of third-party audit results which should address Indicators 2.1.3, 2.2.1, 3.2.3, 4.1.8. 4.2.7.</p>	<p>Similar to the RRAs conducted in Quebec and Alberta, the Working Body has decided to differentiate between Crown land and Private Managed Land in its assessment. This distinction is particularly relevant in British Columbia, where only 18% of Private Managed Land is certified, compared to 67% of Crown land</p>
<p>Economic Interest</p>	<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 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>Annex 6 - REDII Level A risk assessment</p> <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 (timbermarking & 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>Indicator 2.1.3</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 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>- Key Habitat Attributes should be separated from Old Growth in the assessment. & linked to SAR instead. This is an important differentiation because old growth forests are not inherently key habitats. Mitigating risk as</p>	<p>Thank you for sharing the FOR site report. This report has been added to the reference list. We have also updated the RRA with the latest information from the British Columbia group regarding old-growth forest area deferral Old growth deferral areas - Province of British Columbia</p> <p>According to the literature and the requirements in the province of BC, old-growth forests are considered key sensitive habitats, valuable for their unique structural and biological diversity, habitat for diverse species and ecosystem services.</p>

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	<p>it relates to SAR is identifying the key habitat attributes that those species exist in.</p> <ul style="list-style-type: none"> - Relating to Old Growth: Although the deferral process has not been finalized, Forsite completed an assessment (2021) on the state of old forests in BC, suggesting that at least 75% of the province's old growth is either protected or outside of the THLB. The working body should reference this report when considering the current status of Old Growth in the province rather than taking a precautionary approach & assigning specified risk without data. https://www.cofi.org/wp-content/uploads/BC_OldGrowth_2021Status-Report_Oct21-2021.pdf - Relating to IFLs: Members of the working body have completed assessments on IFLs as it relates to the THLB when consulting for BPs in the province. These assessments should be included in the RRA as work to suggest which IFLs have the potential to be impacted from harvest, a number of them will be removed from consideration as they have enough area outside of the THLB to never be impacted by forestry as it relates to the size threshold of what a constitutes an IFL (50,000 ha) 	
	<p>Indicator 2.2.1</p> <p>Relating to Crown Land - Indicator 2.2.10 identifies the complexity & 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 & 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. Indicator 2.2.1 should be more 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.</p> <p>Relating to Private Managed Forest - PMFLs are a specified tax status for the maintenance of forested private land. The Managed Forest Council monitors harvest activities on parcels that have PMFL status to identify conformance to the requirements of maintaining the PMFL tax status, with reforestation being one of the key values of the council. Publicly available audit reports identify high levels of conformance to the reforestation requirements year over year. Reforestation of a site inherently eliminates conversion of forests to non-forest</p>	<p>Thank you for your comment. We have added a missing piece of legislation concerning PMFLs. Private Managed Forest Land Act. The Private Managed Forest Land Program was created in 2003 under the Private Managed Forest Land Act, whereby landowners commit to manage their property for long-term forest production, including meeting legislated goals for key public environmental values and sustainable practices. However, since the Landowners can opt out of this policy if they wish through exit fees, the risk level was maintained as specified risk for private land.</p>

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	<p>use. With the monitoring system & results available, this indicator should be identified as low risk for this sub-scope.</p> <p>Relating to the province & federal data - 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 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 at a supply base level - not use precautionary approaches.</p> <p>Evidence: https://www.mfcouncil.ca/about/annual-reports/ https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment</p>	
	<p>Indicator 2.2.9</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 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>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. 5% of the province is private land, a portion of that 5% is forested, & 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>SBP is committed to using all relevant and verifiable sources of information and knowledge to support the RRA, including public information.</p> <p>Similar to the RRAs conducted in Quebec and Alberta, the Working Body has decided to differentiate between Crown land and Private Managed Land for this indicator. This distinction is particularly relevant in British Columbia, where only 18% of Private Managed Land is certified, compared to 67% of Crown land</p>

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	<p>Evidence https://www2.gov.bc.ca/gov/content/industry/natural-resource-use</p>	
	<p>Indicator 2.2.10</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 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>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. 5% of the province is private land, a portion of that 5% is forested, & 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>Evidence https://www2.gov.bc.ca/gov/content/industry/natural-resource-use</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>Similar to the RRAs conducted in Quebec and Alberta, the Working Body has decided to differentiate between Crown land and Private Managed Land for this indicator. This distinction is particularly relevant in British Columbia, where only 18% of Private Managed Land is certified, compared to 67% of Crown land</p>
	<p>Indicator 3.2.2</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</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>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>Indicator 3.2.3</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 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 4.1.8</p> <p>The assessment of this indicator separates the responsibilities of working professionals from equipment operators & loggers. This should not be separated as the professional Forester is responsible for the sign off that harvesting was completed to a legislated standard that is consistent with the approved CP.</p>	<p>Thanks for your comment. We have modified and reduced the text accordingly.</p>

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	<p>Within the professional responsibility of a Forester, ensuring qualified contractors is an element of due diligence & due care. The indicator should not be assessed against safety practices as indicator 4.1.10 is focused on health and safety. If health & safety are to stay included in this indicator, all companies in the province must conform to the WorkSafeBC regulations, forest companies commonly require contractors to carry BC Forest Safety Council SAFE certification, & the professional forester signing off on the work has the responsibility to ensure safe working conditions as per FPBC Bylaw 9 (Schedule A).</p> <p>Forest operations on public land are monitored by the C&E branch of the government relating to FRPA & FPPR, this includes the environmental aspect of carrying out forestry activities. Contraventions for failure to comply with legislation (including trespass, riparian impacts, & soil degradation) are monitored & fines are levied. In addition to legal recourse, the supervising Forester can have penalties levied against them from FPBC, with record of contravention attached to the status of their designation. With a professional Forester being responsible for the sign off completed operations, each of these mechanisms are significant influences on the training provided to forest workers, and this should not be considered a specified risk with respect to public lands.</p> <p>Evidence in the assessment relating to the MFC & PMFLs states the MFC requires landowners to have adequate training, knowledge, & supervision with new or amended management commitments must get signed off by a forest professional prior to submission to the MFC. The same considerations should be made using the fact that monitoring harvest operations & fines directly impacts training to forest workers. Evidence of compliance to the MFC's auditing in the annual report inherently identifies that workers are aware of their requirements & how to conduct themselves on the ground. This should not be considered specified risk as it relates to PMFLs.</p> <p>Evidence https://www.mfcouncil.ca/about/annual-reports/ https://www.fpbc.ca/wp-content/uploads/2024/01/2024-01-15-FPBC-bylaws-GP-POLICY-fees-final.pdf</p>	
	<p>Indicator 4.2.1</p> <p>This assessment of this indicator contradicts itself in relation to indicators 4.2.4, 4.2.5, & 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</p>	<p>Please note that we have revised the risk rating from low risk to specified risk for indicators 4.2.6 and 4.2.4 on private lands, which relate directly to Indigenous rights and governance. This change reflects the complexity of the</p>

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	<p>and community impacts are incorporated into forest management planning through a consultation process with stakeholders who may be impacted."</p> <ul style="list-style-type: none"> o 4.2.4 - Legal, Customary, & Traditional Tenure / Use Rights is labelled as low risk for all subscopes o 4.2.5 - Grievance & Dispute Mechanisms - Forestry is labelled as low risk for all subscopes o 4.2.6 - Consultation & Accommodation is labelled as low risk for all subscopes <p>The rationale for risk designation in 4.2.6 specifies that there are 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>issues and the limited availability of reliable data concerning Indigenous rights and governance and the need for meaningful engagement.</p>
	<p>Indicator 4.2.7</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 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>The RRA contradicts itself in the rationale for risk designation. The evidence to support this indicator is relevant at a provincial level.</p> <p>In the provincial assessment, it is stated that "The Natural Resource Compliance and Enforcement Database indicates inspections are conducted by FOR occur on Crown land, private managed forest land and other private land to ensure the protection of designated cultural heritage resources.". In the private land sections, it specifies "there is no publicly available information</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>Thank you for your comment. Based on your input on the Heritage Conservation Act, the risk rating for this indicator has been updated from "specified" to "low" at the provincial level</p>

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	<p>describing implementation mechanisms, a monitoring framework, and/or results of the current condition for the protection of cultural heritage sites".</p> <p>A quick search of the Heritage Conservation Act specifies "British Columbia's archaeological sites are protected under the Heritage Conservation Act (HCA). The provisions of the HCA apply whether sites are located on public or private land."</p> <p>This is provincial legislation, not exclusive of crown land, with provisions for inspections and penalties on private dwellings (Specifically, in Division 3 of the Cultural Heritage Act (15.1) Entry and Inspection). Search & Seize warrants are issued under the Offence Act & contraventions of the Heritage Conservation Act are punishable by jail & or fine.</p> <p>Due to data privacy concerns, the names & exact locations of inspections are withheld from the public record within the C&E Database, this does not mean they aren't managed for.</p> <p>These pieces of evidence all relate to show that designated cultural heritage sites in BC are managed and well documented in public databases at a provincial level; The BC Register of Historic Places (BCRHP) maintains a spatial database of designated heritage sites, including designated sites on private property as the current state of designated cultural heritage sites.</p> <p>Evidence</p> <p>https://apps.nrs.gov.bc.ca/bcrhp/search?paging-filter=1&tiles=true https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96187_01#section38 https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96338_01#section21 https://nrced.gov.bc.ca/records;keywords=cultural%20heritage;ms=498;currentPage=5;pageSize=25;sortBy=-dateIssued https://www2.gov.bc.ca/gov/content/transportation/transportation-infrastructure/engineering-standards-guidelines/environmental-management/reference-documents/environmental-regulatory-compliance/archeology-heritage-conservation</p>	
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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

<i>Have the applicable law(s) been identified?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required for Sub-scope: Other Private Land</p>
<i>List of applicable law(s)</i>	<p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act • Forest Planning and Practices Regulation <p><u>Private Managed Forest Land</u></p> <ul style="list-style-type: none"> • Private Managed Forest Land Act • Private Managed Forest Land Regulation <p><u>Other Private Land</u></p> <p>There is no regulatory framework on other private land.</p>
<i>Sources</i>	<ul style="list-style-type: none"> • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • Private Managed Forest Land Act • Private Managed Forest Land Council Regulation

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	<p><u>Crown Land</u></p> <p>On Crown land, the British Columbia (BC) Ministry of Forests (FOR) reviews and approves Forest Stewardship Plans (FSPs) requirements as identified in the FPPR. FOR Compliance and Enforcement Branch (CEB) inspects active worksites to ensure the objectives of FRPA are met. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The Forest and Range Evaluation Program (FREP) measures the effectiveness of forest and range practices, by monitoring and evaluating conditions. Practices are monitored through the Monitoring Protocol. Data is collected and compared with acceptable operational standards to determine if results are consistent with the objective. The Forest Practices Board (FPB) audits and special investigations for planning and practices.</p> <p><u>Private Managed Forest Land</u></p> <p>The Managed Forest Council (MFC) is responsible for compliance and enforcement and the monitoring framework for private managed forest land. MFC conducts annual inspections, with a target of inspecting 10% of all private managed forest lands each year. FOR may request formal audits to be conducted on the private managed forest land program.</p> <p><u>Other Private Land</u></p> <p>On other 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 other private land.</p>
<i>Sources</i>	<ul style="list-style-type: none"> • 2023 Managed Forest Inspection Program

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	<ul style="list-style-type: none"> • 2022 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2017 Managed Forest Inspection Program • FPB Annual Report 2022-2023 • FPB Annual Report 2021-2022 • FPB Annual Report 2020-2021 • FPB Annual Report 2019-2020 • FPB Annual Report 2018-2019 • FOR – Integrated Resource Monitoring • FREP Dashboard • Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required for Sub-scope: Other 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 forest management planning and practices on Crown land. The FPPR sets measurable practice requirements. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Inspection results verify compliance with practice requirements. Based on the evidence reviewed, the legal framework is effective for Crown land in British Columbia.</p> <p><u>Private Managed Forest Land</u></p> <p>Audits and inspection reports completed by the MFC verified landowners comply with regulatory requirements during road construction and maintenance as well as timber harvesting. Based on the evidence reviewed, the legal framework is effective for private managed forest land in British Columbia.</p> <p><u>Other 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, a precautionary approach is applied. Based on evidence reviewed, the legal framework is not effective for other private land in British Columbia.</p>
<i>Sources</i>	<ul style="list-style-type: none"> • 2023 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2017 Managed Forest Inspection Program • FPB Annual Report 2022-2023 • FPB Annual Report 2021-2022 • FPB Annual Report 2020-2021 • FPB Annual Report 2019-2020 • FPB Annual Report 2018-2019 • FOR – Integrated Resource Monitoring

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	<ul style="list-style-type: none"> • FREP Dashboard • Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013
<i>Is the legal framework effective?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required for Sub-scope: Other Private Land</p>

(ii) Forest regeneration of harvested areas

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required for Sub-scope: Other Private Land</p>
<i>List of applicable law(s)</i>	<p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act • Forest Planning and Practices Regulation <p><u>Private Managed Forest Land</u></p> <ul style="list-style-type: none"> • Private Managed Forest Land Act • Private Managed Forest Land Regulation <p><u>Other Private Land</u></p> <p>There is no regulatory framework that requires regeneration after timber harvest on other private land.</p>
<i>Sources</i>	<ul style="list-style-type: none"> • Forest and Range Practices Act (FRPA) • Forest Planning and Practices Regulation (FPPR) • Private Managed Forest Land Act • Private Managed Forest Land Council Regulation

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> The Reporting Silviculture Updates and Land Status Tracking System (RESULTS) manages the submission of openings, disturbances, silviculture activities, and obligation declarations as required by FRPA. Licensees are required to submit annual declaration data. The Forest Stewardship Plan Tracking System allows forest licensees, BC Timber Sales, and FOR to electronically manage FSP submissions. Through the Jasper Corporate Reporting System, stocking standards reports are available to view if associated with FSPs. FOR reviews and approves regeneration delay surveys submitted by Crown licensees. FOR CEB periodically conducts inspections of active worksites to ensure FRPA objectives are met. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The FREP measures the effectiveness of forest and range practices, including regeneration, by monitoring and evaluating the condition of eleven resource values. The FPB audits and conducts special investigations to evaluate regeneration planning and practices.</p> <p><u>Private Managed Forest Land</u> MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including regeneration. MFC conducts annual inspections, with a 10% inspection target of all private managed forest lands each year. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting, destroyed timber, road construction and deactivation, and reforestation activities. FOR may request to conduct a formal audit on the private managed forest land program.</p> <p><u>Other Private Land</u> On other 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 other private land.</p>
<p><i>Sources</i></p>	<ul style="list-style-type: none"> • 2023 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2017 Managed Forest Inspection Program • FPB Annual Report 2022-2023 • FPB Annual Report 2021-2022 • FPB Annual Report 2020-2021 • FPB Annual Report 2019-2020 • FPB Annual Report 2018-2019 • FOR – Integrated Resource Monitoring • FOR Silviculture statistics • FREP Dashboard • Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013
<p><i>Is the enforcement and monitoring ensured for the identified law(s)?</i></p>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required for Sub-scope: Other 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> There is a comprehensive regulatory framework governing regeneration on Crown land. Stocking standards, and annual declarations provide evidence that licensees are complying with regeneration legislation. Government programs and independent auditing boards monitoring forest management practices and provide recommendations for improvement. Inspection results verify compliance with practice requirements related to regeneration. Based on evidence reviewed, the legal framework is effective for Crown land in British Columbia.</p> <p><u>Private Managed Forest Land</u> Audits and inspection reports completed by the MFC verify landowners are complying with reforestation requirements. Based on evidence reviewed, the legal framework is effective for private managed forest land in British Columbia.</p> <p><u>Other Private Land</u> 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 other private land in British Columbia.</p>
<p><i>Sources</i></p>	<ul style="list-style-type: none"> • 2023 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2017 Managed Forest Inspection Program • FPB Annual Report 2022-2023 • FPB Annual Report 2021-2022 • FPB Annual Report 2020-2021 • FPB Annual Report 2019-2020 • FPB Annual Report 2018-2019 • FOR – Integrated Resource Monitoring • FOR Silviculture statistics • FREP Dashboard • Provincial Timber Management Goals, Objectives and Targets: Provincial Timber Targets 2021/22 Status Report • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013
<p><i>Is the legal framework effective?</i></p>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land ✓ No, Level B route is required for Sub-scope: Other Private Land</p>

(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

<p><i>Have the applicable law(s) been identified?</i></p>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land & Other Private Land</p> <ul style="list-style-type: none"> • No, Level B route is required
<p><i>List of applicable law(s)</i></p>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Species at Risk Act (SARA) • Migratory Birds Convention Act

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	<ul style="list-style-type: none"> • Fisheries Act • Canada National Parks Act <p><u>Provincial</u></p> <ul style="list-style-type: none"> • Environment and Land Use Act • Ecological Reserve Act • Park Act • Forests and Range Practices Act (FRPA) • Wildlife Act • Land Act • Environment Management Act • Fisheries Protection Act • Oil and Gas Activities Act • Private Managed Forest Land Act • Environment and Land Use Act • Ecological Reserve Act • Forest and Range Practices Amendment Act • Forest Statutes Amendment Act
<i>Sources</i>	<p><u>Federal</u></p> <ul style="list-style-type: none"> • Canada National Parks Act • Environment and Climate Change Canada • Fisheries Act • Migratory Birds Convention Act • Species at Risk Act <p><u>Provincial</u></p> <ul style="list-style-type: none"> • BC Provincial Parks • Environment and Land Use Act • Environmental Management Act • Environmental Reporting BC. 2017. Land Designations that Contribute to Conservation in B.C. State of Environment Reporting, Ministry of Environment and Climate Change Strategy, British Columbia, Canada. • Find Conservation Lands - Map and Primary Contacts • Forest and Range Practices Amendment Act • Forest Statutes Amendment Act • Forest Stewardship Plans • Forest Stewardship Plans: Mandatory amendments, certification and declared areas • Forests and Range Practices Act • Identified Wildlife Management Strategy • Land Act • National Parks in BC • Park Act • Private Managed Forest Land Act • Wildlife Act

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	<p>At the federal level, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) oversees SARA species, critical habitats and updates SARA listings annually. Fisheries and Oceans 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 British Columbia Conservation Data Centre (BCCDC), under the Ministry of Water, Land and Resource Stewardship (WLRs) oversees the species at risk including the Federal SARA, BC Wildlife Act and Fish Protection Act. As well, BCCDC oversees RTE ecosystems under the Wildlife</p>
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	Act. Both WLRS and FOR oversee wildlife under various legislation and programs. WLRS and the ECCS oversee land designations and protected lands. BC Parks under the Ministry of Environment and Climate Change Strategy (ECCS) oversees Provincial Parks. FOR also oversee land designations that include protection and/or restriction requirements. FOR under FRPA oversees forest planning and practices related to biodiversity values. FOR and ECCS jointly oversee the Cumulative Effects Framework.
<i>Sources</i>	See listing above in Step 1 Sources for Crown land, private managed forest land and other private land.
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land & Other Private Land</p> <ul style="list-style-type: none"> • 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, private managed forest land, and other private land management units. Based on evidence reviewed, the legal framework is effective for Crown land, private managed forest land and other private land in British Columbia.
<i>Sources</i>	See listing above in Step 1 Sources for Crown land, private managed forest land and other private land.
<i>Is the legal framework effective?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land & Other Private Land</p> <ul style="list-style-type: none"> • 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>	<p><u>Soil Quality</u></p> <p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required – Sub-scope: Other Private Land</p> <p><u>Biodiversity</u></p> <p>✓ Yes – Sub-scopes: Crown Land</p> <p>✓ No, Level B route is required – Sub-scope: Private Managed Forest Land & Other Private Land</p>
<i>List of applicable law(s)</i>	<p><u>Soil Quality Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest and Range Practices Act • Forest Planning and Practices Regulation <p><u>Private Managed Forest Land</u></p> <ul style="list-style-type: none"> • Private Managed Forest Land Act • Private Managed Forest Land Regulation • Private Managed Forest Land Council Regulation <p><u>Other Private Land</u></p> <p>There is no regulatory requirements to manage or maintain soil quality or biodiversity on other private land.</p> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • See listing below in Step 1 Sources for Crown licence, private land and private woodlots.

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<i>Sources</i>	<p><u>Soil Quality</u></p> <ul style="list-style-type: none">• Forest and Range Practices Act (FRPA)• Forest Planning and Practices Regulation (FPPR)• Private Managed Forest Land Act• Private Managed Forest Land Council Regulation <p><u>Biodiversity</u></p> <p><u>International</u></p> <ul style="list-style-type: none">• Global Forest Watch• HCV Resource Network HCV Resource Network Common Guidance for the Identification of High Conservation Values.• Intact Forest Landscapes, map• IUCN Globally Threatened Ecosystems• Nature Serve Canada• NatureServe Conservation Status categories• Shape of Nature Globally threatened ecosystems <p><u>Federal</u></p> <ul style="list-style-type: none">• 2020 Wild Species Report• Canada National Parks Act• Environment and Climate Change Canada• Fisheries Act• Migratory Birds Convention Act• Species at Risk Act• Species at Risk Public Registry <p><u>Provincial</u></p> <ul style="list-style-type: none">• A New Future for Old Forests A Strategic Review of How British Columbia Manages for Old Forests Withing its Ancient Ecosystems• Accounts and Measures for Managing Identified Wildlife• BC Ecological classification system• BC Endangered Species list (includes ecosystems) and mapping tool• BC Provincial Parks• Description of enabling legislation for Species at risk• EFlora BC Atlas- searchable database- interactive database, map and photos• Environment and Land Use Act• Environmental Management Act• Environmental Reporting BC. 2017. Land Designations that Contribute to Conservation in B.C. State of Environment Reporting, Ministry of Environment and Climate Change Strategy, British Columbia, Canada.• Find Conservation Lands - Map and Primary Contacts• Forest and Range Practices Amendment Act• Forest Statutes Amendment Act• Forest Stewardship Plans• Forest Stewardship Plans: Mandatory amendments, certification and declared areas• Forests and Range Practices Act• Identified Wildlife Management Strategy• Land Act• Mapping of the Interior Wetbelt Forests and Interior Temperate Rainforests• National Parks in BC• Old Growth Strategic Review Process• Park Act• Priority Deferrals: An Ecological Approach• Private Managed Forest Land Act
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	<ul style="list-style-type: none"> • The Inland Temperate Rainforest and Interior Wetbelt Biomes of Western North America • Wildlife Act <p>Other</p> <ul style="list-style-type: none"> • BC Species at Risk listing and Critical Habitat identification • BC's Old Growth Forest: A Last Stand for Biodiversity • Red-Listed Ecosystem Status of Interior Wetbelt and Inland Temperate Rainforest of British Columbia, Canada • Species at risk recovery in BC: and Audit of Federal and Provincial Actions
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Step 2: Description of enforcement and monitoring

<p><i>Description of the practical implementation of the law(s)</i></p>	<p><u>Provincial</u> WLRs is responsible for oversight of implementation of the Wildlife Act.</p> <p><u>Crown Land</u> On Crown land, FOR reviews and approves FSPs for soil quality requirements as identified in the FPPR. FOR CEB inspects active worksites to ensure the objectives of FRPA are met. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The FREP measures the effectiveness of forest and range practices on soils, by monitoring and evaluating current conditions at the landscape-level and the stand-level. Soils and biodiversity are monitored through the FREP Monitoring Protocol. Data is collected and compared with acceptable operational standards to determine if results are consistent with the objectives and requirements. The FPB audits and special investigations have evaluated soil conservation planning and practices. Specific to biodiversity values, FOR is responsible for oversight of implementation of the FPPR. FOR reviews and approves Crown licensees FSPs for landscape-level and stand-level biodiversity values requirements as identified in the FPPR. FOR CEB conducts inspections of primary forestry activities to ensure compliance with FRPA, FPPR, and approved operational plans as related to landscape-level and stand-level biodiversity requirements. CEB is responsible for updating the Natural Resources Compliance and Enforcement Database, which holds public records of any orders, violations, or administrative penalties. The FREP measures the effectiveness of forest practices for biodiversity requirements, by monitoring and evaluating landscape-level and stand-level biodiversity condition. Monitoring protocol is specific to the FRPA value being evaluated. FREP provides reports specific to FRPA values and/or forest regions of concern. The FPB monitors and reports on forest practices for landscape-level and stand-level biodiversity requirements through audits and special investigations.</p> <p><u>Private Managed Forest Land</u> MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including soil conservation. MFC conducts annual inspections, with a target of inspecting 10% of all private managed forest lands each year. FOR may request formal audits to be conducted on the private managed forest land program. Specific to biodiversity values, owners of private managed forest 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 managed forest land.</p> <p><u>Other Private Land</u> On other private land, owners 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 soil quality and landscape-level or stand-level biodiversity values on other private land.</p>
<p><i>Sources</i></p>	<p><u>Soil Quality</u></p> <ul style="list-style-type: none"> • 2017 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program

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	<ul style="list-style-type: none"> • 2021 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • Assistant Deputy Minister’s Resource Stewardship Report (2016/17) • FPB Annual Report 2018-2019 • FPB Annual Report 2019-2020 • FPB Annual Report 2020-2021 • FPB Annual Report 2021-2022 • FPB Annual Report 2022-2023 • FREP Dashboard • FOR – Integrated Resource Monitoring • Natural Resources Compliance Database • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013 <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • See listing above in Step 1 Sources for Crown licence, private managed forest land and other private land.
<p><i>Is the enforcement and monitoring ensured for the identified law(s)?</i></p>	<p><u>Soil Quality</u></p> <ul style="list-style-type: none"> ✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land ✓ No, Level B route is required – Sub-scope: Other Private Land <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> ✓ Yes – Sub-scopes: Crown Land ✓ No, Level B route is required – Sub-scope: Private Managed Forest Land & Other Private Land

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>Soil Quality & Biodiversity</u></p> <p><u>Crown Land</u></p> <p>There is a comprehensive regulatory framework governing soil conservation on Crown land. The FPPR sets measurable practice requirements. Government programs and independent auditing boards monitor forest management practices and provide recommendations for improvement. Inspection results verify compliance with practice requirements related to soil quality. Based on evidence reviewed, the legal framework is effective for soil conservation on Crown land in British Columbia. Specific to biodiversity values, the Crown licensees’ FSPs, and subsequent operational plans are the primary implementation mechanism of legislation related the management and maintenance of biodiversity values. 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. The BC 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:</p> <ul style="list-style-type: none"> • Woodland Caribou habitat due to the incomplete recovery plan development and/or implementation;
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	<ul style="list-style-type: none"> • 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; and • Priority old growth forest deferral areas and protection has not been completed and finalized. Based on evidence reviewed, the legal framework is not effective for biodiversity on Crown land in British Columbia. <p><u>Private Managed Forest Land</u></p> <p>Audits and inspection reports completed by the MFC verified landowners comply with regulatory requirements for soil disturbance and road construction and maintenance. Based on evidence reviewed, the legal framework for soil quality is effective for private managed forest land in British Columbia. However, for biodiversity values, due to the lack of evidence to support implementation mechanisms, a monitoring framework and/or results of current condition of biodiversity values, a precautionary approach is applied. Based on the lack of evidence, the legal framework is not effective for biodiversity on private managed forest land in British Columbia</p> <p><u>Other 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 other private land in British Columbia.</p>
<p><i>Sources</i></p>	<p><u>Soil Quality</u></p> <ul style="list-style-type: none"> • 2017 Managed Forest Inspection Program • 2018 Managed Forest Inspection Program • 2019 Managed Forest Inspection Program • 2021 Managed Forest Inspection Program • 2022 Managed Forest Inspection Program • Assistant Deputy Minister’s Resource Stewardship Report (2016/17) • FPB Annual Report 2018-2019 • FPB Annual Report 2019-2020 • FPB Annual Report 2020-2021 • FPB Annual Report 2021-2022 • FPB Annual Report 2022-2023 • FREP Dashboard • FOR – Integrated Resource Monitoring • Natural Resources Compliance Database • Private Managed Forest Land Council Managed Forest Program: Effectiveness of the Council Regulation in Achieving the Forest Management Objectives of the PMFLA 2013 <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • See listing above in Step 1 Sources for Crown licence, private managed forest land and other private land.
<p><i>Is the legal framework effective?</i></p>	<p><u>Soil Quality</u></p> <p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required – Sub-scope: Other Private Land</p> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • Yes <p>✓ No, Level B route is required – Sub-scope: Crown Land ,Private Managed Forest Land & Other Private Land</p>

(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>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land ✓ No, Level B route is required – Sub-scope: Other Private Land</p>
<i>List of applicable law(s)</i>	<p><u>Crown Land</u></p> <ul style="list-style-type: none"> • Forest Act • Forest Act, Cut Control Regulation • Forest Act, Allowable Annual Cut Administration Regulation • Forest Act, Allowable Annual Cut Partition Regulation <p><u>Private Managed Forest Land</u></p> <ul style="list-style-type: none"> • Private Managed Forest Land Act (PMFLA) • Private Managed Forest Land Council Regulation <p><u>Other Private Land</u></p> <p>There is no regulatory framework that requires the determination and maintenance of long-term sustainable harvest levels on other private land.</p>
<i>Sources</i>	<ul style="list-style-type: none"> • Forest Act • Forest Act, Allowable Annual Cut Administration Regulation • Forest Act, Allowable Annual Cut Partition Regulation • Forest Act, Cut Control Regulation • Private Managed Forest Land Act

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	<p><u>Crown Land</u></p> <p>FOR is responsible for AAC determination and oversight on Crown land. For management units on Crown land, actual harvest levels are tracked against the AAC through the requirements of the Forest Act and Cut Control Regulation. The Regulation requires each timber licence holder harvest levels be tracked, ensuring harvest levels are at or below the AAC. Penalties may be applied if there is an overcut, and the excess volume harvest is charged against the next cut control period. Undercut is not allowed to be carried forward into the next period.</p> <p><u>Private Managed Forest Land</u></p> <p>MFC is responsible for compliance and enforcement and the monitoring framework for private managed forest land, including harvesting and reforestation. MFC conducts annual inspections, with a 10% inspection target of all private managed forest lands each year. Private managed forest land owners are required to submit annual declaration forms to MFC to report harvesting and reforestation activities. FOR may request to conduct a formal audit on the private managed forest land program.</p> <p><u>Other 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 other private land.</p>
<i>Sources</i>	<ul style="list-style-type: none"> • Allowable Annual Cut – Timber Supply Areas • Allowable Annual Cut – Tree Farm Licences • BC Ministry of Forests. 2022 Economic State of British Columbia's Forest Sector • Managed Forest Council Annual Report 2022-23 • Private Managed Forest Land Council Regulation
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land ✓ No, Level B route is required – Sub-scope: Other 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></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. FOR sets long-term sustainable harvest levels. FOR monitors actual harvest levels. FOR 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 British Columbia.</p> <p><u>Private Managed Forest Land</u></p> <p>On private managed forest land, Regulations and an associated reporting and monitoring system is in place. While the long-term sustainable harvest level on private managed forest land is not publicly available, the compliance rate for re-planting harvested and disturbed areas is high. Based on evidence reviewed, the legal framework is effective for private managed forest land in British Columbia.</p> <p><u>Other 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 other private land in British Columbia.</p>
<p><i>Sources</i></p>	<ul style="list-style-type: none"> ● Allowable Annual Cut – Timber Supply Areas ● Allowable Annual Cut – Tree Farm Licences ● BC Ministry of Forests. 2022 Economic State of British Columbia's Forest Sector ● Managed Forest Council Annual Report 2022-23 ● Ministry of Forests Trends in Timber Harvest in BC ● National Forestry Database ● The State of British Columbia's Forests – Third Edition 2010 ● Timber Supply Review & Allowable Annual Cut ● Timber Supply Review Backgrounder April 2021
<p><i>Is the legal framework effective?</i></p>	<p>✓ Yes – Sub-scopes: Crown Land; Private Managed Forest Land</p> <p>✓ No, Level B route is required – Sub-scope: Other Private Land</p>

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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 – https://unfccc.int/node/61034</p> <p>– Paris Agreement: United Nations Treaty Collection – Canada 22 Apr 2016 – https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-7-d&chapter=27&clang=_en</p> <p>– NDC Registry: Canada – https://unfccc.int/NDCREG</p> <p>Canada’s 2021 Nationally Determined Contribution Under The Paris Agreement – https://unfccc.int/sites/default/files/NDC/2022-06/Canada%27s%20Enhanced%20NDC%20Submission1_FINAL%20EN.pdf</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 (>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.' 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>	

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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