

2020 SFI Public Summary Report

Western Forest Products Inc.

Sustainable Forestry Initiative® (SFI) Fiber Sourcing Standard [2015-2019]

Sustainable Forestry Initiative® (SFI) Forest Management Standard [2015-2019]

Date: February 17, 2021

Project Scope and Objectives

PricewaterhouseCoopers LLP (“PwC”) completed a multi-site Maintenance Assessment on Western Forest Products Inc.’s (“the Company”, “Western”, or “WFP”) Forest Management activities on the Nootka Operation and wood fiber procurement company-wide in British Columbia. The forest management activities for the Mainland Coast Forest Operation are managed by WFP’s Timberlands group based in Campbell River and the corporate fiber sourcing activities are managed by WFP’s Fibre Supply Group based in Nanaimo, BC. The Lead Assessor was James Lucas, EMS (LA). The additional assessment team members were Sean Pledger, EMS (LA), PwC Assessor, Laurie Kremsater, RPBio (BC) and Larry McColloch, PwC Assessor in Training/Observer. The audit team was accompanied by WFP’s SFI Representatives, Will Sloan, RFT and Sarah Germain, RPF.

The primary objective of the assessment was to assess the Company’s SFI management system and to evaluate the Company’s implementation of the SFI Standard in the field.

Client Profile

WFP is an integrated Canadian company sustainably managing forests and manufacturing wood products on the coast of British Columbia. The Company has an annual available harvest of approximately 6.0 million cubic meters of timber, of which approximately 5.9 million cubic meters is from Crown lands. WFP has a lumber capacity in excess of 1.1 billion board feet from 6 milling facilities in Canada and 1 in the US plus two value added facilities. Principal activities conducted by the Company include timber harvesting, reforestation, milling logs into lumber and wood chips, and value-added remanufacturing. WFP’s SFI certification covers both their Mainland Coast and Nootka Forest Operations.

Indicators

All of the indicators in the SFI Forest Management and Fiber Sourcing Standard were within the scope of the assessment, except for Fiber Sourcing Objectives 11, 12 and 13, since none of the fiber procured by WFP comes from outside of Canada and the US. There were no substitute indicators.

The Assessment included the draft SFI® Threatened, Endangered and Species at Risk Module – 09-19-19 Version (“the Module”) as part scope of the Assessment. The specific Species at Risk which were included in the Assessment were Marbled Murrelet and Northern Goshawk. A Registered Professional Biologist in BC (“RPBio BC”) conducted the Assessment with guidance of the PwC Lead Assessor. All indicators within the Module were reviewed and there were no substitute Indicators. Based on our review, WFP was found in conformance with the Module for Marbled Murrelet and Northern Goshawk.

Assessment Process

The assessment was completed from October 1-2 and 5-8, 2020 with a closing meeting held on October 14, 2020. Due to travel restrictions imposed by COVID-19 the office portion of the assessment (October 1-2) was completed remotely using the Google Meets/Microsoft Teams video conferencing platform. The office assessment reviewed WFP’s SFI Forest Management (including the Draft SFI Threatened and Endangered Species Module) and Fiber Sourcing programs including staff interviews and a review of appropriate documentation to assess policies and procedures and the implementation of SFI program requirements.

During the following week (October 5-8) Sean Pledger conducted field reviews of the Forest Management program on the Mainland Coast operating area. In total the assessment team, consisting of Sean Pledger and James Lucas, spent 3 days completing office reviews and 1.5 days on field assessments. In total, the field audit team visited 6 harvesting and roads sites with 3 being active and 3 completed.

WFP has a multi-site certification for the forest management and wood fiber procurement in North America including the following: Mainland Coast and Nootka Forest Operations, and Wood Fiber Procurement company-wide in British Columbia. PwC uses a rotational audit approach where the central office is audited annually, and the locations are sampled on a 3-year rotating schedule that conforms to the International Accreditation Forum Inc.’s Mandatory Document 1.

Summary of Conformance, Findings, and Good Management Practices

FOREST MANAGEMENT

SFI Forest Management Objective	Evidence of Conformity
<p>Objective 1. Forest Management Planning To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), TFL management plans and Info packages, GIS data and Woodstock data and sample TSA files with constraint files and outputs, Cut Control Summary by TFL and License, Lidar review, VILUP, WFP Forest Strategy, forest management plans, site plans and field observations.</p> <p>Summary: The Allowable Annual Cut (“AAC”) is determined through the BC Timber Supply Review (“TSR”) process. WFP harvests on various licenses at different points during their cut control period to manage stumpage prices, green up constraints and First Nations concerns. Inventory information is a combination of Provincial Vegetation Resources Inventory (“VRI”) data and digitized Mylar information. Lidar data is being processed to generate inventory information and will be incorporated into the multiyear planning process. WFP are currently updating the analysis for TFL 19.</p> <p>Volumes are found on an operational basis by the planning and engineering groups. There is a split of second growth and old growth, which follow the WFP Forest Strategy and the Vancouver Island Land Use Plan (“VILUP”). District planning staff and engineers locate timber and are responsible for layout and Cutting Permit (“CP”) development.</p> <p>WFP has full in-house capability to perform internal timber supply analysis. WFP utilizes Woodstock to perform timber supply analysis. Growth and yield data (VDPY and TIPSYS programs) are taken both from internal and Government sources. WFP also manages all spatial data in their in-house ArcGIS system. Data inputs include forest inventory, roads, Timber Harvest Land Base (“THLB”) layer, non-timber values and constraint layers (e.g. UWR, WTPs, WHAs, etc.).</p> <p>Stand conversion into other types is not acceptable under BC Forest Practices rules and Western has not implemented this type of conversion in the past. Western manages plantation establishment using approved Forest Stewardship Plans (“FSP”) stocking standards that include specifications for preferred and acceptable species as per Provincial silvicultural legislation requirements.</p>

	<p>The Company does not have forestlands that have been converted into non forestland use within the scope of their certification.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 2. Forest Health and Productivity To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), Western Site Plans, BC silviculture regulations, BC Stocking Standards, silviculture records, EMS procedures, harvest site plans, and Pest Management Plan. Field assessments/observation and records.</p> <p>Summary: The Company plants most harvest areas within one to two years after harvesting with sampled blocks showing planting one year after harvest. Following planting, the Company completes regeneration surveys in order to ensure all harvested areas are satisfactorily stocked and survival rates are acceptable. Stocking standards and acceptable species are determined by the requirements stated in FSPs and carried down to the Site Plan (“SP”) level. Retention harvesting systems consider the biodiversity values associated with reserve areas and restricts the opening size and distance between mature forest. Where feasible, damage to advanced regen is limited while harvesting/yarding.</p> <p>On the Mainland Coast operation, there is no herbicide use. All brushing is manual, either girdle or falling. Primary targets are alder, cottonwood and maple.</p> <p>Forest Stewardship Plans have site disturbance limits for permanent and temporary access structures. The Company’s Environmental Management System (“EMS”) includes measures to maintain forest and soil productivity. This information is communicated to contractors at pre-work meetings and continually monitored through WFP inspections.</p> <p>Soil samples are taken to determine soil textures and vulnerability to disturbance. Harvest plans specify logging methods, including cable harvesting and helicopter systems for steep slopes and the use of excavators to forward logs on sensitive lower slope terrain. Road drainage structures are regularly maintained. FSP and SPs have soil disturbance ratings based on site sampling and post-harvest assessments ensure soil disturbance targets are met in the field. Post-harvest piling and road deactivation is completed on most blocks. Grass seeding with native seed is done on all new road construction to reduce the spread of invasive plants and maintain soil integrity. The phase and post-harvest inspection processes are designed to limit impacts and ensure any excessive soil disturbance is rehabbed. Coarse Woody Debris (“CWD”) requirements are included in Site Plans.</p> <p>The Company complies with applicable laws, regulations and follows guidelines regarding measures that must be taken to protect forest resources (i.e., <i>Wildfire Act</i>). Landscape level and Site Plans address forest health issues. Monitoring and quantifying pest incidence within reforested stands is performed by forestry professionals. Harvest inspections ensure compliance with fire preparedness expectations. Additionally, the Company works cooperatively with MFLNRORD programs to ensure that pest and fire prevention challenges are identified and dealt with in a timely manner. Forestry workers are trained in fire suppression and have equipment on site. Sites are assessed for their fire hazard post-harvest and slash is burned where appropriate.</p> <p>Research, testing and evaluation of genetically improved seedlings are conducted by the MFLNRORD. All seedlings are grown in privately owned nurseries, each of which is involved in various research endeavors and trials for the forest industry and the MFLNRORD. Western owns Class A Seed at the Surrey Seed Centre for future use.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 3. Protection and Maintenance of Water Resources To protect the water</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), WFP Rainfall Shutdown Standard, Roads Standard Operating Procedures (SOPs), Road Inspection Records, Field Observations, FSP, Site Plans, records of Pre-work meetings, Western logger training records, and EMS/SFI Safety Manual.</p>

<p>quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.</p>	<p>Summary: Standards Operating Procedures (“SOP”) in the WFP EMS state environmental criteria to be managed which includes management of water quality. These requirements are incorporated into the development of site level plans for harvesting, road building and silvicultural activities that have the potential to impact the environment. Contracts with loggers also include requirements to comply with Best Management Practices (“BMPs”). Harvest units reviewed during the assessment included pre-harvest reviews, active harvest inspections and post-harvest closeouts. Inspections at the Mainland Coast operation are done on a monthly basis. When WFP Operations staff are not on site, a designated foreman and backup will be at the operations daily with the objective of ensuring conformance to the plan and BMPs.</p> <p>The Company complies with applicable laws, regulations and guidelines (where appropriate) regarding management and protection of water bodies and riparian zones. Operational controls, including monitoring, have been implemented through the WFP EMS to protect the soil and water resources.</p> <p>All operations are inspected to ensure compliance with the legislation and conformance with the EMS. The Company maintains a GIS system which contains a layer for riparian features which is used to track riparian features and is updated with field provided information as required.</p>
<p><i>One Nonconformity was identified related to this objective. No Opportunities for Improvement were identified.</i></p> <ul style="list-style-type: none"> In general, the level of stream protection found during field assessments was adequate and met the Harvest Instructions, however for one unit, stream protection and clean out did not meet the Harvest Instructions and should be reviewed/addressed. 	
<p>Objective 4. Conservation of Biological Diversity To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand-and-landscape-level measures that promote a diversity of types of habitat and successful stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), CENFOR, ARCGIS, Provincial Forestry databases, Plant/animal inventory and OGMA changes, WFP invasive species procedure, Forest Stewardship Plans, Pest Management Plans, Grass Seeding Standard, Land Use Order and FRPA requirements, Timber Supply Analysis and Management Plans, WFP Biodiversity Management Strategy, and Site Plans, WFP Species at Risk Training program, Goshawk Management Strategy and Field Card, WFP Rare Ecosystem Project includes habitat for T&E species, GIS Layers (various), Participation/Support for: Marbled Murrelet Recovery Team, Northern Goshawk Recovery Team, Technical Assistance for Federal and Provincial Northern Goshawk Recovery Strategies, Vancouver Island Marmot Recovery Team, Coast Forest Products Species at Risk Committee, SARA National Roundtable, WCSIC support for Nature Conservancy Project BC Species and Ecosystems Explorer, NatureServe, WFP Forest Strategy and WFP Big Tree Policy.</p> <p>Summary: WFP’s FSP, TSA Management Plans and site plans all incorporate the conservation of biological diversity by setting objectives, results and strategies to meet legislative requirements such as landscape and stand level biological diversity, objectives for water, fish, wildlife and biological diversity within riparian areas, and objectives set for soils and wildlife. Measures are carried in the site level plans developed by Registered Professional Foresters. WFP has put significant resources into planning for and managing biological diversity. WFP has full time biologists on staff to support company goals for conservation of biological diversity. Conservation measures at the site level were reviewed in the field. Any unique features such as Karst, terrain or rare ecosystems are identified in the field and protected in the engineering and harvest program.</p> <p>WFP's key approach is landscape level reserves in conjunction with seral stage distribution and stand level practices. Reserves act as both coarse and fine filters, maintaining mature and old forest in general but also focusing on habitat for species at risk, particularly Marbled Murrelet (“MAMU”) and Northern Goshawk (“NOGO”). Other reserves such as Ungulate Winter Range (“UWRs”) also help to ensure mature and old forest. More than half of the operation uses a retention silviculture system which maintains forest influence over at least</p>

<p>important sites.</p>	<p>half the block. Those trees and patches will ensure snags, downed wood and stand structure is maintained in the future. VILUP has seral stage requirements; the Great Bear Rainforest (“GBR”) Order has landscape reserves that maintain representation (and structure) at the landscape level. Landscape level reserves including Old Growth Management Areas (“OGMAs”), Wildlife Habitat Areas (“WHAs”), UWRs, voluntary reserves and non-contributing landbase, maintain stand structures on the landscape. In harvestable areas, retention silviculture or wildlife tree patches and external retention maintain stand structures. The 5-year monitoring on retention forestry patches identified weaknesses in 2011 and 2016 and has resulted in improvements in retention standards and calculations. There is an enhanced focus on patch retention with less dispersed retention, which is better for biodiversity. WFP beat internal targets for the amount of forestry and wildlife tree retention targets. The WFP Big tree policy exceeds government standards (lower required diameters and height) and big trees are kept in retention patches, not as dispersed retention.</p> <p>WFP is part of several research initiatives actively collecting data on Northern Goshawk, MAMU, Western Screech-owl, and a general bird study. WFP is also involved with Landscape Reserve Design which focuses on identifying high value old forests for reserve area and are identifying rare plant communities with experts. WFP both supports and actively participates in external programs such as recovery teams and the GBRO's OPIC Operational Planning and Implementation Committee (“OPIC”), but also funds and implements internal research to develop internal policy direction. MFLNRORD recognizes the WFP wildlife lead as the integral driver of MAMU implementation planning. WFP tracks reserves, seral stage, WHAs, OGMAs and stand level retention in Cengea and their GIS. Lidar is also used extensively in finding and evaluating habitat and retention areas. This reporting is linked to monitoring of biodiversity values. For example, amounts of habitats in each seral stage and amounts in riparian reserves are monitored to track breeding bird habitat for different species.</p> <p>WFP focuses efforts on government and public priorities. For example, recent legal requirements to reserve key areas of old forest led to rapidly revised harvest plans. WFP leads licensees and often leads government in addressing requirements of recovery strategies and often has sat on recovery teams to help set those directions. WFP follows higher legislation and helps guide legislation. They are part of the GBRO OPIC along with First Nations, licensees, government and other stakeholders to develop landscape reserves across their operating areas within the GBR. These reserves consider multi objective planning with a focus on ecosystem representation and five focal species including OGMA plans, MAMU and NOGO habitat and WHAs. WFP has species accounting system to help identify species most potentially affected by forestry and assess habitat amounts for those species, current focus mainly breeding birds.</p> <p>For species not at risk but of special concern, WFP has actions around bear dens, eagle nest, other raptor nests, heron nest/rookeries, bat caves, amphibian ponds, and UWRs. WFP manages a GIS layer of these known features. Individual block layout verifies if any of these features exist. WFP follows Provincial policy and regulations on buffer requirements (streams, wetlands, small lakes) and generally exceeds them for larger lakes, especially if toads are found near those lakes. GBRO requires protection of forested swamps and representation of all site series in the landscape reserve. Representation levels in the reserve for wetland features is high.</p> <p>WFP has a program to identify and report invasive plants to the Province via the Invasive Alien Plant Program (“IAPP”) 'Report a Weed' process. Management of identified sites includes advice to road building and harvest crews and then addressing the occurrence through appropriate physical or chemical means.</p> <p>Primary natural disturbances on the Mid Coast operations are windthrow, landslides, and small gap tree replacement. Harvest units and internal patches are designed to limit/reduce the risk of blowdown and edges are 'wind firmed' in some areas. Fire preparedness and weather monitoring during operations reduces the risk of fire and there are fire/weather related shutdowns as per regulations.</p> <p>WFP subscribes to a variety of organizations (e.g. ABCFP, UBC Forestry, BC Conservation</p>
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	Data Centre, and the MFLNRORD) which maintain websites and newsletters to disseminate information on current research projects. These information centers help to keep practitioners aware of new forest management techniques, public opinion and forest policy/guidelines.
<p><i>No Nonconformities were identified related to this objective. Three Opportunities for Improvement were identified related to this objective.</i></p> <ul style="list-style-type: none"> • WFP compiles lists of Red and Blue listed species annually to address species and ecosystems of special concern. WFP may wish to highlight the subset of these Red and Blue species listed that could be affected by forestry activities and review with Planning and Operations staff to consider any important management operations. • Currently, WFP has a policy around Big Trees which is suitable for operations in Old-Growth forests. If operations occur in areas of second growth, WFP may wish to consider smaller diameters on veteran trees to retain. • WFP retains the Variable Retention (“VR”) experimental sites in several its Divisions. These sites represent a valuable legacy and an important potential opportunity for learning about the effects of VR on biodiversity. WFP may wish to consider revisiting these sites across their operations to assess the key elements and current forest condition. It is recognized that this would be a challenging endeavor, but this could be an excellent joint project which could be supported by government, First Nations, academic institutions and potentially SFI itself. 	
<p>Objective 4a. T&E/SAR Module</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), CENFOR, ARCGIS, Provincial Forestry databases, Plant/animal inventory and OGMA changes, WFP invasive species procedure, Forest Stewardship Plans, Pest Management Plans, Grass Seeding Standard, Land Use Order and FRPA requirements, Timber Supply Analysis and Management Plans, WFP Biodiversity Management Strategy, and Site Plans, WFP Species at Risk Training program, Goshawk Management Strategy and Field Card, WFP Rare Ecosystem Project includes habitat for T&E species, GIS Layers (various), Participation/Support for: Marbled Murrelet (MAMU) Recovery Team, Northern Goshawk Recovery Team, Technical Assistance for Federal and Provincial Northern Goshawk Recovery Strategies, Vancouver Island Marmot Recovery Team, Coast Forest Products Species at Risk Committee, SARA National Roundtable, WCSIC support for Nature Conservancy Project BC Species and Ecosystems Explorer, NatureServe, WFP Forest Strategy and WFP Big Tree Policy.</p> <p>Summary: Species at Risk considered are Northern Goshawk and Marbled Murrelet. Both have recovery strategies and/or implementation plans. WFP is involved in research initiatives for NOGO and MAMU and western screech-owl (“WESO”) to better understand Threatened & Endangered (“T&E”) wildlife issues across their landbase. The results of these initiatives are incorporated into their SOPs and FSPs when renewed.</p> <p>WFP offers training in Species at Risk (“SAR”) every year, with the aim of having staff and contractors trained at least every 2 years. Training includes all staff, contract planners and layout crews. Operational staff on the production side also get training which includes field cards and EMS level 1, which includes identification of SAR and wildlife field identification cards. External SAR information is annually updated with the BC Conservation Data Centre (“CDC”) results into WFP’s GIS and other systems both for non-sensitive and confidential layers. Locations found by WFP during the year are reported to the MFLNRORD Regional Biologist who forwards the information to the BC CDC. Internal locations of SAR are updated within 24 hours into internal mapping systems (ArcMap) and this layer shows nests and WHA outlines.</p> <p>The mandatory requirements include finding hectares of critical habitat for MAMU and new WHAs for NOGO and at present, most of the new WHAs are in consultation phase or proposed. For NOGO locations found that are not planned to be WHAs, voluntary reserves are established around the nest(s). Legal MAMU Orders are pending but WFP is working proactively with stakeholders including First Nations and communities to find and set aside more MAMU habitat. WFP maps both NOGO and MAMU habitat to Provincial and better</p>

	<p>standards. NOGO habitat is identified by finding birds and buffering nests while MAMU habitat is identified by low level airphoto flights/interpretation the cost for which is funded entirely by WFP. Most NOGO areas large enough (~200ha) are planned to become WHAs while other NOGO nest areas are protected with voluntary no harvest reserves (usually smaller than WHA). WFP also has additional disturbance buffers noted in WFP standards that restrict operations (including harvesting, blasting, road building) during the breeding season.</p> <p>WFP is part of several research initiatives actively collecting data on Northern Goshawk and Western Screech-owl. That includes participating in recovery teams, participating in NOGO genetic research, and monitoring habitat. As well, WFP did many years of MAMU radar and audio-visual monitoring, which was replaced by monitoring directed by Government as designed by researchers at UBC. Government, however, has not continued MAMU work in WFP areas and is not doing broad radar surveys but rather more targeted monitoring. WFP continues monitoring MAMU habitat amounts, but not birds directly. WFP is looking at using LIDAR to identify habitat (in partnership with UBC researchers). WFP have received Habitat Conservation Trust Fund (“HCTF”) funding to identify best MAMU habitat to include in new reserves that will be required when the new Order is finalized.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this module.</i></p>	
<p>Objective 5. Management of Visual Quality and Recreational Benefits To manage the visual impact of forest operations and provide recreational opportunities for the public.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), GIS, multiple harvest unit SPs including VIAs.</p> <p>Summary: The Company has visual quality strategies contained within its Forest Stewardship Plans and complies with government established higher level plans such as the Great Bear Rainforest Order. Visual Quality Objectives are reviewed pre-harvest, visual assessments are conducted (if required) from established viewpoints, and blocks are planned to ensure that visual requirements are met.</p> <p>Average size of cutblocks in WFP Operations can be calculated in GIS and CENFOR databases. The average size of the units harvested over the audit period was 14.7 ha.</p> <p>Green-up requirements are stated within WFP Forest Stewardship Plans (“FSP”) which are based on regional land use plan management zone requirements. WFP has tracking systems in use to ensure conformance with green-up requirements.</p> <p>The Company manages recreation sites for public use in various locations on Vancouver Island and maintains a layer in their GIS system to track these sites.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 6. Protection of Special Sites To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), GIS, and block files including FRPS checklists, AIAs and SPs. Field Observations.</p> <p>Summary: WFP Forest Stewardship Plans contain a cultural heritage resource strategy. The Company engages with stakeholders and First Nations to ensure that planning activities are able to manage all known special or culturally sensitive sites. Available special site or cultural information databases will also be consulted to allow for inclusion of any areas not already included in the planning process.</p> <p>Assessments to determine the potential and presence of special sites and strategies for their management are incorporated into harvest area planning. WFP maintains a layer within their GIS for special sites which includes cultural features. This information is used to determine potential harvesting constraints in block planning. GIS layers include: roads/landings/ water layers/geology/special features (e.g. karst, cabins)/Visual Quality Objectives/wildlife layers (deer winter range etc.)/arch sites/trappers/community watersheds etc.</p>

<i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i>	
<p>Objective 7. Efficient Use of Fiber Resources To minimize waste and ensure the efficient use of fiber resources.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), 2019 Residue and Waste Surveys spreadsheet, and Harvest Inspection Forms. Field Observations.</p> <p>Summary: Site Plans specify standards for post-harvest conditions. WFP utilization requirements are written into harvest contracts and are distributed and reviewed with field workers to ensure they are understood. Active harvest and post-harvest inspections confirm these standards are met. Log quality programs, waste audits and site inspections also ensure target utilization is met.</p>
<i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i>	
<p>Objective 8. Recognize and Respect Indigenous Peoples' Rights To recognize and respect Indigenous Peoples' rights and traditional knowledge.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version) and WFP Sustainable Forest Management Statement.</p> <p>Summary: Western's Sustainable Forest Management Statement includes a commitment to recognize and respect the rights of First Nations' ("FN") Peoples. WFP program appears to be robust and is a foundational aspect of WFP SFM program.</p> <p>WFP's operations (SFI and CSA) overlap with approximately 45 traditional territories. WFP has an Executive position (Director, Indigenous Relationships) whose role is to build relationships with all FN that have traditional territories overlapping with their operations. The relationship building at the corporate and operations levels requires a cultural understanding and WFP is working towards developing joint ventures with many. In recent years they have formed Limited Partnerships ("LP") with some First Nations (Huu-ay-aht) and similar structures are being proposed with several others.</p> <p>WFP engage in discussions with FN at the FSP level as well as the individual Cutting Permit ("CP") level. In many areas, Archaeological Overview Assessment's ("AOAs") are done where required and all pre-1846 Culturally Modified Trees ("CMTs") are documented and set aside within blocks where they were found. There are a variety of other initiatives going on such as providing cedar logs for canoes and Non-Timber Forest Products are being harvested/picked. WFP's GIS includes some areas of known high value sites, when those areas are shared with the Company.</p>
<i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i>	
<p>Objective 9. Legal and Regulatory Compliance To comply with applicable federal, provincial, state, and local laws and regulations.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fibre Sourcing Information Package (March 2019), WFP Trained Logger List - 2019, 2018 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MR - April 2019, Environmental Policy, EMS Compliance Log and Site visits to stumpage sales.</p> <p>Summary: WFP has a comprehensive EMS program in place which includes legal and regulatory commitments, procedures to ensure compliance, defined roles and responsibilities, internal auditing of activities and review and revision of legal compliance by senior management.</p> <p>WFP's has a Director of Environment role whose responsibility is environmental compliance across the Company's operations. The Director of Environment is in regular discussions with government and industry associations (COFI, BC Business Council) where updates on regulations and legislation are received. Forest Management regulatory updates are communicated through the organization to relevant staff when they occur. These updates are provided to WFP through individuals in working groups and through COFI and Quickscribe.</p> <p>The Company also monitors websites, and changes to relevant laws and regulations. The Certification & EMS Manager conducts periodic reviews of changes to relevant laws and</p>

	<p>regulations and will determine if changes are required to programs or procedures to facilitate compliance. Any documentation changes will be made in accordance with EMS document control procedures.</p> <p>The Company complies with provincial and federal social and labor legislation in Canada. A variety of WFP corporate policies are in place to ensure conformance including a health and safety policy, an annual employee code of conduct sign-off and policies for bullying and harassment and workplace violence. The Company is Safe Certified with the Forest Safety Council of British Columbia.</p>
<p><i>One Nonconformity was identified related to this objective. No Opportunities for Improvement were identified.</i></p> <ul style="list-style-type: none"> WFP uses the Incident Tracking System (“ITS”) within Cengea to document and track compliance issues and action plans across its operations. For the Mainland Coast Operations, a query of open ITS records were reviewed. For a sample of these records, while it appeared that required inspections (Post Harvest, Final Road) were being completed in a timely manner, it was unclear whether any identified follow up issues were entered into ITS and when and if they were completed and closed out in a timely manner. 	
<p>Objective 10. Forestry Research, Science and Technology To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), Goshawk Research Program, Migratory Birds project through COFI, various other projects, and WCSIC website</p> <p>Summary: WFP has a robust Corporate Research Program: examples include Variable Retention Adaptive Management, Species at Risk, Silviculture Strategies and Best Practices, Seed and Seedling projects, and Growth and Yield and EBM research and monitoring. Additional projects are undertaken through support for/partnerships with FP Innovations.</p> <p>The Company utilizes Provincial growth and yield data and results of timber supply analysis.</p> <p>WFP has its own Climate Change Committee and staff attends ABCFP Workshops and monitors the webpage for information. WFP staff also monitor the SFI website and various sources of research information including the BC Government website. WFP is transitioning towards using the Climate Based Seed Transfer System for close to 100% of their seedling allocations. This initiative is an example of efforts to mitigate the impacts of climate change on forest health.</p> <p>Through the Timber Supply Review process, the Company participates in MFLNRORD forest health, productivity and ecosystem functions analysis that includes carbon research.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 11. Training and Education To improve the implementation of sustainable forestry practices through appropriate training and education programs.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fibre Sourcing Information Package (March 2019), WFP Trained Logger List - 2020, 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MR 2020</p> <p>Summary: WFP updated their SFM policy in January 2020. It includes a commitment to Sustainable Forest Management and the principals of SFI. It is signed by Vice President Partnerships, Sustainability & Chief Forester Shannon Janzen, RPF, and Vice President Timberlands, Don Holmes, RPF. Additionally, the company has provided more detail regarding their commitment to Fiber Sourcing in the WFP CoC SOP and the WFP Fiber Sourcing Information Package.</p> <p>The WFP EMS Manual Appendix 5 describes the Roles and Responsibilities of the various staff and departments with regards to the SFI program. Key roles are: Vice President Partnerships, Sustainability & Chief Forester, Vice President, Fibre Supply, Certification and EMS Manager, the MERC (Management Environmental Review Committee), Managers and various other Departments. Roles are well defined including Tasks and Responsibilities. Training requirements are found in the Training Table document and include EMS and SFI Fiber Sourcing and Manufacturing CoC SOPs.</p>

	<p>The WFP Training Table identifies all the training requirements of woodlands, shop and warehousing staff and contractors. The frequency of review and listings of the specific SOPs required by position are included. Training records are maintained to ensure all active workers are competent in their tasks.</p> <p>WFP Fiber Sourcing Information Package (developed consistent with WCSIC Wood Producer Package and Training Policy) is given to all contractors. The materials include WFP's EMS training including SOPs. All contractors are trained in WFP's EMS prior to any work being conducted on WFP harvest units - either on their managed tenures or on stumpage sales.</p> <p>The WCSIC Training Policy and Wood Producer Information Package identify criteria and delivery mechanisms for wood producers. The WCSIC website also contains links to sources of training material. Western conducts annual training to address continual improvement and informs contractors when appropriate training courses are available.</p>
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No Nonconformities or Opportunities for Improvement were identified related to this objective.

<p>Objective 12. Community Involvement and Landowner Outreach To broaden the practice of sustainable forestry through public outreach, education and involvement, and to support the efforts of SFI Implementation Committees.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), WCSIC member roster, WCSIC website and inconsistent reporting line.</p> <p>Summary: The Company encourages forest landowners to participate in forest management certification programs through the distribution of the WCSIC Wood Producer Information Package. WFP has a certified Chain of Custody which tracks all certified fiber from large and small landowners.</p> <p>WFP representatives have attended WCSIC meetings and have participated in internal working groups focused on various initiatives.</p> <p>WFP promotes the WCSIC Inconsistent Practice/Complaint Flow Chart for members and have provided a contact on their web page for reporting inconsistent practices. The WFP web site and contact us page also gives the public the ability to get in touch regarding any issues they might have regarding logging or other practices.</p> <p>WFP conducts tours of its facilities and forest management activities from time to time. WFP provides in-kind support of school programs (e.g., classroom visits, tree planting events, etc.), run summer student programs, support/ participate in National Forestry Week and the Festival of Forests (teachers tour).</p> <p>The company also maintains recreation sites, trails and maintains resource roads utilized by the public and guide outfitters.</p>
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No Nonconformities or Opportunities for Improvement were identified related to this objective.

<p>Objective 13. Public Land Management Responsibilities To participate and implement sustainable forest management on public lands.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), Western FSP and SPs.</p> <p>Summary: As WFP manages multiple public tenures across Vancouver Island and the BC Coast, the company is involved in a variety of planning and management efforts including: Land Use Orders and FRPA, Forest Stewardship Plan Consultations, Permits (CP, RP, SUP, etc.), PMP Consultations, Information Sharing and Engagement, Timber Supply Review, Stakeholder meetings and information sharing. Since the 2016 Great Bear Rainforest Order came into effect, the successful approval of any forest management planning or activities are largely dependent on the strength of relationships between WFP and partnering First Nations. As such, significant information sharing takes place as part of this process.</p>
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No Nonconformities or Opportunities for Improvement were identified related to this objective.

<p>Objective 14. Communications and Public Reporting To increase transparency and to annually report progress on conformance with the SFI 2015-2019 Forest Management Standard.</p>	<p>Evidence: Review of SFI survey submission records.</p> <p>Summary: PwC is responsible for producing this report and submitting it to SFI on behalf of WFP. WFP submitted their annual progress report to SFI on time, in March 2020.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 15. Management Review and Continual Improvement To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.</p>	<p>Evidence: Interviews with WFP staff. MERC Management Review 2020 meeting minutes, EMS Manual - Management Review Process, Audits – Internal and External</p> <p>Summary: Western undertakes Management Reviews as part of the EMS process. This includes a review of the SFI program and performance measures. Topics of discussion include SFI, previous findings, and a review of the SFI program for Forest Management and Fiber Sourcing.</p> <p>An annual MERC meeting is required by their procedures and was conducted in May 2020 to review certification findings and progress on action items, revisions to procedures, roles and responsibilities, inspection results, and other incidents/business as required. A wide variety of action items were generated out of the 2020 MERC meeting. WFP completes annual internal audits covering each certified operation. The 2020 SFI internal audit report (Sept 2, 2020) covered the SFI Forest Management and Fibre Sourcing standards and noted multiple findings for program improvement. Findings are assigned to relevant staff and tracked in the Cengea ITS module. All items in ITS require action plans with due dates, and all overdue action plans are distributed weekly to the operations and management groups.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	

FIBER SOURCING

SFI Fiber Sourcing Objective	Evidence of Conformity
<p>Objective 1. Biodiversity in Fiber Sourcing To address the practice of sustainable forestry by conserving biological diversity.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fibre Sourcing Information Package (March 2019), 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms</p> <p>Summary: The majority of volume that WFP purchases is through Crown sources which fall under the <i>Forest & Range Practices Act</i> (“FRPA”) and purchases from private lands generally fall under the <i>Private Managed Forestland Act</i> (“PMFLA”) both of which address biodiversity issues. All small private purchases which do not fall under the PMFLA are risk assessed and visited both pre-purchase and inspected during the course of operations. WFP Fibre Sourcing group has good knowledge of Sustainable Forest Management (“SFM”) practices in BC and they consult with the Timberlands group regarding any biodiversity issues which might apply to any purchase. Staff and contractor EMS training includes information on T&E species and other biodiversity issues. All sources are subject to a “Risk Assessment” at the time of purchase and where warranted, field inspections are conducted to ensure Best Management Practices are being implemented, and that operations meet FRPA requirements around biodiversity, soil conservation, and riparian management, among other things.</p> <p>WFP is involved in a wide variety of programs and efforts to address and conserve biodiversity</p>

	<p>in British Columbia. These efforts include the following: Ecosystems Explorer and NatureServe Resources for Global Occurrence Ranks Identification, Participation/ Support for: Marbled Murrelet Recovery Team, Northern Goshawk Recovery Team, Technical Assistance for Federal and Provincial Northern Goshawk Recovery Strategies, Vancouver Island Marmot Recovery Team, Coast Forest Products Species at Risk Committee, SARA National Roundtable, Meeting for interest in Western Screech Owl, SAR Mapping (Government and WFP), THLB Stabilization Pilot San Jo landscape unit, Marbled Murrelet and Northern Goshawk habitat mapping into WHAs, and Rare ecosystems. The Company has multiple biologists on staff.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 2. Adherence to Best Management Practices To broaden the practice of sustainable forestry through the use of best management practices to protect water quality.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fiber Sourcing Information Package (March 2019), WFP Trained Logger List - 2020, 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, and Site visits to stumpage sales.</p> <p>Summary: For all purchased stumpage, excluding BC Timber Sales, (standing timber that WFP or WFP Contractors harvest), the WFP EMS is followed which includes BMPs (SOPs). For BCTS sales, WFP follows the BCTS EMS/SFI requirements at a minimum and the WFP EMS when they exceed the BCTS requirements. The stumpage procurement program includes an initial assessment of each stumpage sale to assess timber quality, logistics and other factors including resource values, a WCSIC Risk Assessment is completed for all stumpage purchases (may be multiple blocks) and trained/qualified logging contractors are hired by WFP for each stumpage sale and in many situations WFP hires an RPF directly to write the SP. Additionally, all of the road building (if any) and harvesting activities are carried out under WFP's EMS and the relevant SOPs. The EMS also includes harvest inspections which are carried out by WFP staff at the various offices which administer the stumpage sales on behalf of the WFP procurement group.</p> <p>The Chain of Custody Standard Operating Procedure (SOP), which includes the FSC and PEFC risk assessment and Chain of Custody training information provide additional rigor around fiber sourcing with respect to Best Management Practices and sustainable forest practices.</p> <p>At present, the majority of the WFP verifiable monitoring system is described in the CoC procedures under the Verification of Fiber Supply section - it consists of supplying Fiber Sourcing Information and training package, WCSIC Risk Assessment for each stumpage purchase and field inspection forms to assess levels of compliance with BMPs across WFP stumpage sales.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 3. Use of Qualified Resource and Qualified Logging Professionals To encourage forest landowners to utilize the services of qualified logging professionals, certified logging professionals (where available) and qualified resource</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fiber Sourcing Information Package (March 2019), WFP Trained Logger List - 2020, 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms</p> <p>Summary: The Wood Producer Information Package encourages the use of qualified logging and resource professionals. Certification of logging professionals is not readily available in BC so WCSIC members provide training for their contractors, including annual training updates.</p> <p>WFP Operations retain lists of trained loggers maintained within the EMS Files (and training database where applicable). These logging contractors generally work on company tenures and are well known to the company and trained in the Company's EMS program. Logging contractors used at the Port Alberni operations are all qualified contractors and used on WFP public land management. Discussed with WFP Divisional Operations Manager and Operations Technician.</p>

professionals.	A list of trained Fibre Suppliers is maintained by Fibre Supply (record of circulation of the FS Information Package to suppliers).
<i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i>	
<p>Objective 4. Legal and Regulatory Compliance To comply with applicable federal, provincial, state and local laws and regulations.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fibre Sourcing Information Package (March 2019), WFP Trained Logger List - 2019, 2018 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MR - April 2019, Environmental Policy, EMS Compliance Log and Site visits to stumpage sales.</p> <p>Summary: WFP has a comprehensive EMS program in place which includes legal and regulatory commitments, procedures to ensure compliance, defined roles and responsibilities, internal auditing of activities and review and revision of legal compliance by senior management.</p> <p>WFP's has a Director of Environment role whose responsibility is ensuring environmental compliance across the Company's operations. The Director of Environment is in regular discussions with government and industry associations (COFI, BC Business Council) where updates on regulations and legislation are received. Forest Management regulatory updates are communicated through the organization to relevant staff when they occur. These updates are provided to WFP through individuals in working groups and through COFI and Quickscribe.</p> <p>The Company also monitors websites, and changes to relevant laws and regulations. The Certification & EMS Manager conducts periodic reviews of changes to relevant laws and regulations and will determine if changes are required to programs or procedures to facilitate compliance. Any documentation changes will be made in accordance with EMS document control procedures.</p> <p>The Company complies with provincial and federal social and labor legislation in Canada. A variety of WFP corporate policies are in place to ensure conformance including a health and safety policy, an annual employee code of conduct sign-off and policies for bullying and harassment and workplace violence. The Company is Safe Certified with the Forest Safety Council of British Columbia.</p>
<i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i>	
<p>Objective 5. Forestry Research, Science and Technology To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), Goshawk Research Program, Migratory Birds project through COFI, various other projects, and WCSIC website</p> <p>Summary: WFP has a robust Corporate Research Program: examples include Variable Retention Adaptive Management, Species at Risk, Silviculture Strategies and Best Practices, Seed and Seedling projects, and Growth and Yield and EBM research and monitoring. Additional projects are undertaken through support for/partnerships with FP Innovations.</p> <p>The Company utilizes Provincial growth and yield data and results of timber supply analysis.</p> <p>WFP has its own Climate Change Committee and staff attends ABCFP Workshops and monitors the webpage for information. WFP staff also monitor the SFI website and various sources of research information including the BC Government website. WFP is transitioning towards using the Climate Based Seed Transfer System for close to 100% of their seedling allocations. This initiative is an example of efforts to mitigate the impacts of climate change on forest health.</p> <p>Through the Timber Supply Review process, the Company participates in MFLNRORD forest health, productivity and ecosystem functions analysis that includes carbon research.</p>

No Nonconformities or Opportunities for Improvement were identified related to this objective.

<p>Objective 6. Training and Education To improve the implementation of sustainable forestry practices through appropriate training and education programs.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), SFI Fibre Sourcing Information Package (March 2019), WFP Trained Logger List - 2020, 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MR 2020</p> <p>Summary: WFP updated their SFM policy in January 2020. It includes a commitment to Sustainable Forest Management and the principals of SFI. It is signed by Vice President Partnerships, Sustainability & Chief Forester Shannon Janzen, RPF, and Vice President Timberlands, Don Holmes, RPF. Additionally, the company has provided more detail regarding their commitment to Fiber Sourcing in the WFP CoC SOP and the WFP Fiber Sourcing Information Package.</p> <p>The WFP EMS Manual Appendix 5 describes the Roles and Responsibilities of the various staff and departments with regard to the SFI program. Key roles are: Vice President Partnerships, Sustainability & Chief Forester, Vice President, Timber Supply, Systems Coordinator, the MERC (Management Environmental Review Committee), Managers and various other Departments. Roles are well defined including Tasks and Responsibilities. Training requirements are found in the Training Table document and include EMS and SFI Fiber Sourcing and Manufacturing CoC SOPs.</p> <p>The WFP Training Table identifies all the training requirements of woodlands, shop and warehousing staff and contractors. The frequency of review and listings of the specific SOPs required by position are included. Training records are maintained to ensure all active workers are competent in their tasks.</p> <p>WFP Fibre Sourcing Information Package (developed consistent with WCSIC Wood Producer Package and Training Policy) is given to all contractors. The materials include WFP's EMS training including SOPs. All contractors are trained in WFP's EMS prior to any work being conducted on WFP harvest units - either on their managed tenures or on stumpage sales.</p> <p>The WCSIC Training Policy and Wood Producer Information Package identify criteria and delivery mechanisms for wood producers. The WCSIC website also contains links to sources of training material. Western conducts annual training to address continual improvement and informs contractors when appropriate training courses are available.</p>
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No Nonconformities or Opportunities for Improvement were identified related to this objective.

<p>Objective 7. Community Involvement and Landowner Outreach To broaden the practice of sustainable forestry through public outreach, education, and involvement and to support the efforts of SFI Implementation Committees.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), WCSIC member roster, WCSIC website and inconsistent reporting line.</p> <p>Summary: The Company encourages forest landowners to participate in forest management certification programs through the distribution of the WCSIC Wood Producer Information Package. WFP has a certified Chain of Custody which tracks all certified fiber from large and small landowners.</p> <p>WFP representatives have attended most of the latest WCSIC meetings and have participated in internal working groups focused on various initiatives.</p> <p>WFP promotes the WCSIC Inconsistent Practice/Complaint Flow Chart for members and have provided a contact on their web page for reporting inconsistent practices. The WFP web site and contact us page also gives the public the ability to get in touch regarding any issues they might have regarding logging or other practices.</p> <p>WFP conducts tours of its facilities and forest management activities from time to time. WFP provides in-kind support of school programs (e.g., classroom visits, tree planting events, etc.), run summer student programs, support/ participate in National Forestry Week and the</p>
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	<p>Festival of Forests (teachers tour).</p> <p>The company also maintains recreation sites, trails and maintains resource roads utilized by the public and guide outfitters.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 8. Public Land Management Responsibilities To participate and implement sustainable forest management on public lands.</p>	<p>Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Sept. 2016 version), Western FSP and SPs.</p> <p>Summary: As WFP manages multiple public tenures across Vancouver Island and the BC Coast, the company is involved in a variety of planning and management efforts including: Land Use Orders and FRPA, Forest Stewardship Plan Consultations, Permits (CP, RP, SUP, etc.), PMP Consultations, Information Sharing and Engagement, Timber Supply Review, Stakeholder meetings and information sharing. Since the 2016 Great Bear Rainforest Order came into effect, the successful approval of any forest management planning or activates is largely dependent on the strength of relationships between WFP and partnering First Nations. As such, significant information sharing takes place as part of this process.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 9. Communications and Public Reporting To increase transparency and to annually report progress on conformance with the SFI Fiber Sourcing Standard.</p>	<p>Evidence: Review of SFI survey submission records.</p> <p>Summary: PwC is responsible for producing this report and submitting it to SFI on behalf of WFP. WFP submitted their annual progress report to SFI on time, in March of 2020.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	
<p>Objective 10. Management Review and Continual Improvement To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.</p>	<p>Evidence: Interviews with WFP staff. MERC Management Review 2020 meeting minutes, EMS Manual - Management Review Process, Audits – Internal and External</p> <p>Summary: Western undertakes Management Reviews as part of the EMS process. This includes a review of the SFI program and performance measures. Topics of discussion include SFI, previous findings, and a review of the SFI program for Forest Management and Fiber Sourcing.</p> <p>An annual MERC meeting is required by their procedures and was conducted in May, 2020 to review certification findings and progress on action items, revisions to procedures, roles and responsibilities, inspection results, and other incidents/business as required. A wide variety of action items were generated out of the 2020 MERC meeting. WFP completes annual internal audits covering each certified operation. The 2020 SFI internal audit report (Sept 2, 2020) covered the SFI FM and FS standards and noted multiple findings for program improvement. Findings are assigned to relevant staff and tracked in the Cengea ITS module. All items in ITS require action plans with due dates, and all overdue action plans are distributed weekly to the operations and management groups.</p>
<p><i>No Nonconformities or Opportunities for Improvement were identified related to this objective.</i></p>	

Specific good management practices are noted below:

- The use of Lidar to determine levels of forest influence and distribution (Version 2) and for Visual Impact pre-assessments is a good way to reduce reworks when planning harvest units in visually sensitive areas.
- WFP has contributed significantly and involvement in species at risk committees is exemplary.
- WFP has been proactive in looking for WHAs and MAMU habitat.
- The TFL 44 Limited Partnership between the Huu-ay-aht First Nations and WFP demonstrates a commitment to working with Indigenous partners in the forest industry.
- WFP's broadcast fertilization program may lead to updated Growth & Yield curves which could be applied to enhance the Provincial Timber Supply Review process.
- Tagging and GPS marking all leave trees is a good way to ensure prescribed retention is tracked and maintained on site.
- On harvest unit STF 056, the harvesting operator observed a portion of the block was too wet for his machine, stopped work, and opted to have a hand faller work in that area.
- WFP's Landscape Data Blocks program incorporates Lidar and other GIS data to identify likely road and boundary locations across their operating area.
- Good protection of special features was observed during the field audit, including the Sunshine Coast Trail, bear dens and cultural features.
- WFP's program of wind firming continues to be effective in mitigating windthrow impacts.

Conclusion

The Company has maintained conformance with the requirements of the Sustainable Forestry Initiative Fiber Sourcing Standard [2015-2019] and the Sustainable Forestry Initiative Forest Management Standard [2015-2019]. The Certificate can be obtained by contacting Will Sloan, RFT of Western Forest Products Inc. at (250) 202-5290 or by email at wsloan@westernforest.com. More information on WFP's sustainable forestry program can be found at: <https://www.westernforest.com/responsibility/environment/certification/>

The next SFI Assessment will be a Re-certification Assessment in the Summer of 2021. The registration expires on November 6, 2021.

