

2022 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: November 24, 2022

Project Scope and Objectives

PricewaterhouseCoopers LLP ("PwC") completed a multi-site Maintenance Assessment on Western Forest Products Inc.'s ("the Company", "Western", or "WFP") including forest management activities on the Nootka and Mainland Coast Forest Operations and the corporate fiber sourcing activities managed by WFP's Fibre Supply Group based in Nanaimo, BC. The Lead Assessor was James Lucas, RPF, EMS (LA). The additional assessment team members were Khoi Mai, FIT, EMS (A), Nick Beals, RPF, EMS (A), Luke Dimler, FIT, EMS (A) and PwC Assessor, Del Ferguson, P.Geo., Eng.L, FGAC. The assessment team was accompanied by WFP's certification representatives, Will Sloan, RFT and Sarah Germain, RPF, BIT.

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 as well as fibre sourcing operations for their primary sawmills in British Columbia.

Indicators

All 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.

Assessment Process

The assessment was completed on site from May 24-26 to June 1-3, 2022 with a closing meeting held on the final day, June 3, 2022. The office portion of the assessment was conducted in Campbell River on May 24 and 25. An additional half day of document review was conducted on May 19. The office assessment reviewed WFP's SFI Forest Management 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 (June 1-3) a portion of the assessment team reviewed fiber sourcing activities near Port McNeil (June 1, 2022) and the full assessment team reviewed forest management activities on

June 2 & 3 for WFP's Nootka operations based out of Gold River. In total, the assessment team spent 5 assessor days completing office reviews (including 1 day of document review) and 5 assessor days of field reviews. In total, the field audit team visited 7 harvesting (2 active) and 2 active road sites as well as 3 procurement/fiber sourcing sites.

WFP has a multi-site certification for the forest management and a single-site certification for 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 assessment approach where the central office is assessed 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

FOREST MANAGI	EMENT
SFI Forest	
Management	Evidence of Conformity
Objective	
Objective 1.	Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI
Forest	Certification Matrix (Feb. 2022 version), TFL management plans and Info packages, GIS
Management	data and Woodstock data and sample TSA files with constraint files and outputs, Cut Control
Planning	Summary by TFL and License, Lidar review, VILUP, WFP Forest Strategy, forest
To ensure forest	management plans, site plans and field observations.
management plans	C TITTE CHILL STITE
include long-term	Summary: WFP has full in-house capability to perform internal timber supply analysis. WFP
sustainable harvest	use VDYP and TIPSY for their G&Y modeling and Patchworks and Woodstock for harvest
levels and measures	modeling. They have developed internal ARC GIS tools such as the Block Check Tool for
to avoid forest	checking planned units for known resource values. The province completes AAC analysis as
conversion	part of the TSR process for WFP's area-based licenses. 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 is highly integrated into
	WFP's planning and analysis work. WFP has initiated a test using satellite imagery to assess
	blowdown in and around OGMA's.
	blowdown in and around oomrs.
	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"). Operations planning staff and engineers locate
	timber and are responsible for layout and Cutting Permit ("CP") development. 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.).
	constraint layers (e.g. own, wires, etc.).
	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.
	The Company does not have forestlands that have been converted into non forestland use
	within the scope of their certification.
No Nonconformities	or Opportunities for Improvement were identified related to this objective.
Objective 2.	Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI
Forest Health	Certification Matrix (Feb. 2022 version), Western Site Plans, BC silviculture regulations, BC
and Productivity	Stocking Standards, silviculture records, EMS procedures, harvest site plans, and Pest
To ensure long-	Management Plan. Field assessments/observation and records.
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. **Summary:** Reforestation plans are documented primarily through the silviculture instructions sheet which is developed for each block. Site Plans reference the applicable stocking standard and FSP's identify which standards are applicable to the operating area. Natural regen is used in some areas (of MCFO and Nootka), typically higher elevation sites with a low risk of brush competition. Regeneration delays and free growing timelines are specified in the silviculture instructions. 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. Natural regen is surveyed at year 3 post-harvest. The FSP allows for a 6 year regen delay. 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 regeneration is limited while harvesting/varding. Noble fir is sometimes planted on high elevation sites with a Southern exposure. This is included in the Central Island FSP and allowed by the Provincial SPAR/seed sourcing system.

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.

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.

The Company complies with applicable laws, regulations and follows guidelines regarding measures that must be taken to protect forest resources (i.e., *Wildfire Act*). 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.

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.

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

Objective 3.
Protection and
Maintenance of
Water Resources
To protect the water
quality of rivers,
streams, lakes,
wetlands and other
water bodies
through meeting or
exceeding best

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 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.

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").

management practices.

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.

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.

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.

One Nonconformity was identified related to this objective.

• At the Nootka Forest Operation there was an issue with piling debris on an S-6 stream as well as stream clean out in some other locations. The final harvest inspection took place with snow on the ground which led to some of the items being missed at that time.

One Opportunity for Improvement was identified related to this objective.

• There was a small over-blasting issue while constructing a road in the Nootka Forest operation, some neighboring trees had evidence of damage.

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

important sites.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 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.

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.

WFP's key approach in the Nootka operating area 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 operation has retention harvesting which maintain forest influence over at least half the block. Mainland Coast does not require retention harvest but blocks small

(generally less than 10 ha) and need 15% retention and internal retention if greater than 20 ha. in size. Retained trees and patches will ensure snags and down wood and WFP has applied significant effort in developing robust programs to support this objective. They have gone above and beyond what may SFI participants have done. They have implemented and supported numerous programs to enhance diversity. WFP surpasses internal targets for 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.

For Species at Risk, they are mostly proposed WHA's and it takes a while for gov't process to make WHAs official. For NOGO locations found outside of the WHA stream, voluntary reserves are set around each. MAMU legal Orders out for consultation and supported in general by WFP. Additionally, WFP has updated their standard procedures around bear dens and additionally, have standards for eagle nests, other raptor nests, heron nest/rookeries, bat caves, amphibian ponds, and UWRs. WFP have researched a variety of owls for many years and will be involved in the Western Screech Owl ("WESO") recovery strategy when finalized.

Various field cards and procedures (SOPs) were observed in use at the operations. Field sites visited demonstrated the application of the WFP programs for biodiversity. Data sources were noted in the GIS systems. WFP's GIS system allows all overlapping interests to be seen and guide bock layout. WFP has incorporated their research on regional wildlife into their staff and as well as contractor training programs. Lidar is used to map forest influence at block level and adjust block design accordingly.

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. GBRO Landscape Reserve Design directs block locations. 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.

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.

WFP subscribes to a variety of organizations (e.g. ABCFP, UBC Forestry, BC Conservation Data Centre, and the MOF) 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.

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

Objective 5. Management of Visual Quality and Recreational Benefits

To manage the visual impact of forest operations and provide recreational opportunities for the public.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), GIS, multiple harvest unit SPs including VIAs.

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.

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 around 10ha.

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.

The Company manages recreation sites for public use in various locations on Coastal BC and maintains a layer in their GIS system to track these sites.

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

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. **Evidence:** Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), GIS, and block files including FRPS checklists, AIAs and SPs. Field Observations.

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. Expert advice is sought on a regular basis from First Nations, Registered Professional Biologist's and Geotechnical professionals. Protection measures are specified in WFPs standards for various values including Bear Dens, Nests and Big Trees.

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. Good protection around several special features observed during field audit, all of which were appropriately mapped including bear dens and CMT's. Some wildlife features have seasonal restrictions within 500m, 1000m circles and these were clearly documented on harvesting maps.

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

Objective 7. Efficient Use of Fiber Resources To minimize waste and ensure the efficient use of fiber resources.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), Residue and Waste Surveys spreadsheet, and Harvest Inspection Forms. Field Observations.

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. Utilization is reviewed during phase inspections and final inspections, and this is a key consideration during site visits by harvesting supervisors. A large portion of WFP's operations are within the Coast Fiber Recovery Zones which carry increased waste penalties for leaving merchantable fibre. No concerns were found with the size/scale of piles observed during the field audit.

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

Objective 8. Recognize and Respect Indigenous Peoples' Rights To recognize and respect Indigenous Peoples' rights and traditional

knowledge.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version) and WFP Sustainable Forest Management Statement.

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.

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.

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 were where 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.

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

Objective 9. Legal and Regulatory Compliance To comply with applicable federal, provincial, state and local laws and regulations.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version, WFP Trained Logger List – 20-21, 2018 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR – May 25, 2022, Environmental Policy, EMS Compliance Log and field visits.

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.

WFP 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.

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.

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.

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

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.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), Goshawk Research Program, Migratory Birds project through COFI, various other projects, and WCSIC website

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.

The Company utilizes Provincial growth and yield data and results of timber supply analysis.

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.

Through the Timber Supply Review process, the Company participates in MFLNRORD forest

health, productivity and ecosystem functions analysis that includes carbon research.

WFP staff are regular participants in the WCSIC. Through their annual dues WFP support various community outreach initiatives and research projects. Outside of the SIC, WFP's inhouse Biologist is a member of various Provincial and National species recovery teams and their silviculture specialist is part of the Genetics Council Team.

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

Objective 11. Training and Education

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), WFP Trained Logger List – 20-21, 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR – May 25, 2022

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.

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.

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.

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.

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.

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

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

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), WCSIC member roster, WCSIC website and inconsistent reporting line.

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.

WFP representatives have attended WCSIC meetings and have participated in internal working groups focused on various initiatives.

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

Committees.

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.

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).

The company also maintains recreation sites, trails, and maintains resource roads utilized by the public and guide outfitters.

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

Objective 13. Public Land Management Responsibilities To participate and implement sustainable forest management on public lands.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), Western FSP and SPs.

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.

WFP work with government on several fronts in order to conduct operations on Crown land. The FSP and CP process requires regular communication with the FLNRORD to ensure the approval of these documents which are required for operations to proceed. At a higher-level WFP's Senior Biologist works with government scientists and land use planners on the development and implementation of biodiversity specific plans. WFP's main Silviculture Research Forester oversees a long-term research project on broadcast fertilization of cedar and hemlock. The data from this will eventually lead to new Growth & Yield curves for similar treatments in TASS and TIPSY and will feed into the government TSR process.

WFP is required to seek input from local stakeholders prior to harvesting. These include First Nations, trappers and guides, watershed groups, adjacent landowners, and others. Specific consultation takes place during the development of Forest Stewardship Plans, Pest Management Plans, permits (CP, RP, SUP, etc.), Information Sharing & Engagement (FN's), Timber Supply Reviews, Stakeholder meetings and information sharing such as BC Caving Society and Nootka Watershed Society. Additionally, as part of their CSA certification covering other divisions WFP maintain five Public Advisory Groups (PAG's) which meet regularly (both in person and remotely) to discuss WFP's operations and SFM efforts.

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

Objective 14. Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the SFI 2015-2019 Forest Management Standard.

Evidence: Review of SFI survey submission records.

Summary: PwC is responsible for producing this report and submitting it to SFI on behalf of WFP. It can be found at: https://www.sfidatabase.org Records for the SFI report are stored in a number of databases including Cenfor, GIS, financial records, research documents and communication records. Nootka and Mid-Coast managers assemble the data for the full corporate report.

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

Objective 15.

Evidence: Interviews with WFP staff. MERC Management Review 2021 meeting minutes,

Management Review and Continual Improvement

To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

EMS Manual - Management Review Process, Audits – Internal and External

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.

An annual MERC meeting is required by their procedures with one being conducted in the past year (Dec 9, 2021 and May 19, 2022). Monthly Timberland EMS reporting takes place to discuss incidents, audits, complaints, and outstanding actions. WFP is working on expanding their monitoring program to meet more of the requirements for internal audits. Certification findings and progress on action items, revisions to procedures, roles and responsibilities, inspection results, and other incidents/business are standing discussion topics at WFP's MERC meetings.

WFP completes annual internal audits covering each certified operation. In 2022 these audits consisted of a mix of remote document review and interviews conducted by a qualified internal auditor, interviewing WFP staff, and conducting field reviews. There were a few OFI's, NC's and GMP's identified but all small issues.

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

FIBRE SOURCING

SFI Fiber	
Sourcing	
Objective	
Objective 1.	
Biodiversity in	
Fiber Sourcing	
To address the	
practice of	
sustainable forestry	
by conserving	
biological diversity.	

Evidence of Conformity

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), SFI Fibre Sourcing Information Package (March 2019), 2021 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms

Summary: The majority of volume that WFP purchases is through Crown sources which fall under *the Forest & Range Practices Act* ("FRPA") and purchases from private lands generally fall under the Private Managed Forestland Act ("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 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.

WFP is involved in a wide variety of programs and efforts to address and conserve biodiversity 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.

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

Objective 2. Adherence to

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), SFI Fiber Sourcing Information Package (March

Best Management Practices

To broaden the practice of sustainable forestry through the use of best management practices to protect water quality.

2019), WFP Trained Logger List - 2021, 2021 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, and Site visits to stumpage sales.

Summary: For all purchased stumpage, excluding BC Timber Sales, (standing timber that WFP or WFP Contractors harvest), the WFP EMS or other equivalent SFI certified systems are followed which includes BMP's (SOP's). 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.

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.

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.

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

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 professionals. **Evidence:** Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), SFI Fiber Sourcing Information Package (March 2019), WFP Trained Logger List – 2021, 2021 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms

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.

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.

A list of trained Fibre Suppliers is maintained by Fibre Supply (record of circulation of the FS Information Package to suppliers).

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

Objective 4. Legal and Regulatory Compliance

To comply with applicable federal, provincial, state and local laws and regulations.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (Feb. 2022 version), SFI Fibre Sourcing Information Package (March 2019), WFP Trained Logger List – 2021, 2018 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR – May 25, 2022, Environmental Policy, EMS Compliance Log and field visits.

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.

WFP 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.

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.

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.

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

Objective 5. Forestru 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. **Evidence:** Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), Goshawk Research Program, Migratory Birds project through COFI, various other projects, and WCSIC website

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.

WFP has recently completed a study with COFI and Genome BC on the genetic variation within Northern Goshawks and have identified that the threatened subspecies in BC is only located in Haida Gwaii. At their Saanich seed nursery and orchard, WFP participates with NR Can, MFLNRORD and UBC on numerous projects and WFP funding used to leverage other research funding for projects at UBC to track genetic markers for traits of interest such as drought resistance and cold hardiness. WFP contract specialists are looking at hydrology risk assessments in various areas and are using NCASI to analyze Western Screech-owl data.

The Company utilizes Provincial growth and yield data and results of timber supply analysis.

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.

Through the Timber Supply Review process, the Company participates in MFLNRORD forest health, productivity and ecosystem functions analysis that includes carbon research.

WFP staff are regular participants in the WCSIC. Through their annual dues WFP support various community outreach initiatives and research projects. Outside of the SIC, WFP's inhouse Biologist is a member of various Provincial and National species recovery teams, and their silviculture specialist is part of the Genetics Council Team.

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

Objective 6. Training and Education

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), WFP Trained Logger List – 2021, 2020 SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR – May 25, 2022

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.

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.

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.

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.

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.

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

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.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), WCSIC member roster, WCSIC website and inconsistent reporting line.

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.

WFP representatives have attended WCSIC meetings and have participated in internal working groups focused on various initiatives.

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.

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).

The company also maintains recreation sites, trails and maintains resource roads utilized by the public and guide outfitters.

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

Objective 8. Public Land Management Responsibilities To participate and implement sustainable forest management on

public lands.

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix (2022 version), Western FSP and SPs.

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.

WFP work with government on several fronts in order to conduct operations on Crown land. The FSP and CP process requires regular communication with the FLNRORD to ensure the approval of these documents which are required for operations to proceed. At a higher-level WFP's Senior Biologist works with government scientists and land use planners on the development and implementation of biodiversity specific plans. WFP's main Silviculture Research Forester oversees a long-term research project on broadcast fertilization of cedar and hemlock. The data from this will eventually lead to new Growth & Yield curves for similar treatments in TASS and TIPSY and will feed into the government TSR process.

WFP is required to seek input from local stakeholders prior to harvesting. These include First Nations, trappers and guides, watershed groups, adjacent landowners and others. Specific consultation takes place during the development of Forest Stewardship Plans, Pest Management Plans, Permits (CP, RP, SUP, etc.), Information Sharing & Engagement (FN's), Timber Supply Reviews, Stakeholder meetings and information sharing such as BC Caving Society and Nootka Watershed Society. Additionally, as part of their CSA certification covering other divisions WFP maintain two Public Advisory Groups (PAG's) which meet regularly (virtually over the past year) to discuss WFP's operations and SFM efforts.

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

Objective 9. Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the SFI 2015-2019 Forest Management Standard.

Evidence: Review of SFI survey submission records.

Summary: PwC is responsible for producing this report and submitting it to SFI on behalf of WFP. It can be found at: https://www.sfidatabase.org WFP submitted their annual progress report to SFI on time, in late March, 2021. Records for the SFI report are stored in a number of databases including Cenfor, GIS, financial records, research documents and communication records. Nootka and Mid-Coast managers assemble the data for the full corporate report.

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

Objective 10. Management Review and Continual Improvement To promote continual improvement in the

Evidence: Interviews with WFP staff. MERC Management Review 2021 meeting minutes, EMS Manual - Management Review Process, Audits – Internal and External

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.

practice of sustainable forestry by conducting a management review and monitoring performance. An annual MERC meeting is required by their procedures with two being conducted in the past year (Dec 9, 2021 and May 19, 2022). Monthly Timberland EMS reporting takes place to discuss incidents, audits, complaints, and outstanding actions. WFP is working on expanding their monitoring program to meet more of the requirements for internal audits. Certification findings and progress on action items, revisions to procedures, roles and responsibilities, inspection results, and other incidents/business are standing discussion topics at WFP's MERC meetings.

WFP completes annual internal audits covering each certified operation. In 2021 these audits consisted of a mix of remote document review and interviews conducted by a qualified third-party auditor, supplemented by WFP staff conducting field reviews. OFI's, NC"s and GMP's were identified for most operations. Findings are assigned to relevant staff and tracked in Cenfor's 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.

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

Specific good management practices are noted below:

- Contract operator Darrell Shillito of LRS Contracting Ltd was interviewed and his work observed on unit K221. Operator had excellent recognition of the significance of his work deactivating the road through cross ditching construction and sideditch clearing as it pertains to steep gradients and high elevation nature of the unit. Crossditches observed were well constructed being sized and shaped appropriately for discharge across while still being smooth to drive over.
- Electronic blasting logs to capture information and images at various sites and road engineer on staff of one road builder.
- The inspection regime for SFI FS units is rigorous and includes inspections being completed for all units.
- The WFP fibre sourcing/procurement team has been working hard to develop strategic relations with First Nations to broker mutually beneficial and long term fibre supply arrangements.
- Mentoring processes ongoing with contractors (NRC/Olympic) and new/young workers as well as WFP staff (wooden box culvert installs on 51-50).
- Contractor's level of EMS awareness and performance across all Divisions.
- Internal monitoring process helps to focus on key programs (eg. variable retention) to evaluate success in delivering programs.

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 Maintenance Assessment in the Summer of 2023. That Assessment will also be transition to the SFI 2022 Standards. The registration expires on November 6, 2026.