

2023 SFI Public Summary Report

Western Forest Products Inc. Sustainable Forestry Initiative® (SFI) 2022 Fiber Sourcing Standard Sustainable Forestry Initiative® (SFI) 2022 Forest Management Standard

Date: September 15, 2023

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 Mainland Coast 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 Nick Beals, RPF, EMS (A), Cynthia Lu, RPF, EMS (A), and Derry Sorgen, EMS (AIT). 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 Standards 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 fiber sourcing operations for their primary sawmills in British Columbia.

Indicators

Not all indicators in the SFI Forest Management ("FM") and Fiber Sourcing ("FS") Standards were within scope of this year's Maintenance Assessment. Objectives 2, 3, 5, 7, and 12 of the SFI Forest Management Standard were not reviewed and Objectives 5, 7, and 8 of the SFI Fiber Sourcing Standard were also not tested. These Objectives will be reviewed during the next Maintenance Assessment in 2024. All of the new Objectives and Indicators in the 2022 SFI FM and FS Standards were reviewed as part of the Transition Assessment. There were no substitute indicators.

Assessment Process

The Assessments for both standards were completed from June 5th-9th, 2023, with a closing meeting held on June 16th, 2023. A half day of document review was conducted on June 1st to review both standards. The office portion of the Fiber Sourcing review was conducted virtually on June 5th and the Forest Management standard was reviewed on June 9th in WFP's Campbell River office. 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. Fiber sourcing field activities near Port McNeil were reviewed on June 6th. A field review of Forest Management activities occurred on June 7th-8th of WFP's Mainland Coast Forest Operations. In total, the field audit team visited 8 harvesting (1 active), road development/deactivation, reforestation sites as well as 3 procurement/fiber sourcing sites. In total, the assessment team spent 2.5 days completing office reviews (including the half day of document review) and 3 days of field reviews.

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

| SFI Forest | | |
|--|---|--|
| Management | Evidence of Conformity | |
| | Evidence of Comornity | |
| Objective Objective 1. Forest Management Planning To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion | Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix, 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. Summary: WFP has full in-house capability to perform internal timber supply analysis. WFP use VDYP and TIPSY for their G&Y modeling and Patchworks and Woodstock for harvest modeling. They have developed internal ARC GIS tools such as the Block Check Tool for checking planned units for known resource values. The Province completes AAC analysis as 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 Old Growth Management Areas ("OGMA's"). 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.). 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 | |
| No Nonconformities | within the scope of their certification. | |
| No Nonconformities or Opportunities for Improvement were identified related to this objective. | | |
| Objective 2. Forest Health and Productivity To ensure long- | Reviewed in the field for 2023 | |

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.

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 management practices.

Reviewed in the field for 2023

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

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

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

with Exceptional Conservation Value, old-growth forests and ecologically important sites. 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, but one Opportunity for Improvement was identified related to this objective.

• The organization could review its procedures to ensure its operational documents are consistent.

Objective 5.
Management of
Visual Quality
and
Recreational
Benefits
To manage the

Reviewed in the field for 2023

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

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, 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

To minimize waste and ensure the efficient use of fiber resources.

Reviewed in the field for 2023

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

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

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 WFP Sustainable Forest Management Statement and WFP First Nation Policy.

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, but one Opportunity for Improvement was identified related to this objective.

• The organization may consider including more established framework language in the First Nation policy.

Objective 9. Climate Smart Forestry

To ensure forest management activities address climate change adaptation and mitigation measures. **Evidence:** Interviews with WFP staff, Climate Change Mitigation Strategies for Healthy, Resilient Forests and Carbon Modelling Report and Reforestation Prescription Standard.

Summary: WFP has done extensive investigation into analyzing and identifying key risks to its forestry operations posed by climate change. WFP has developed mitigation strategies for each of the climate risk priorities and how they fit into broader regional climate adaptation strategies and plans where they exist. The organization has developed a comprehensive carbon modelling program to track its scope 1, 2, and 3 emissions. This reporting has received additional third party verification. WFP has committed to reporting their progress towards achieving climate change adaptation strategies and plans through the SFI Annual Survey.

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

Objective 10. Fire Resilience and Awareness

To limit susceptibility of forests to undesirable impacts of wildfire and to raise community awareness of fire benefits, risks, and minimization measures.

Evidence: Interviews with WFP staff and contractors, SFI FM Evidence Package, Fire Hazard Assessment Standard, and BC Wildfire engagement documents.

Summary: WFP firefighting equipment. Foresters receive annual wildfire training. WFP contractors conduct weather monitoring and have fire equipment on every harvest unit during fire season. WFP is an active participant for numerous engagements with the British Columbia Wildfire Service and other Forest Licensees to raise awareness on all aspects of wildfire.

WFP foresters work to reduce incidence and severity of wildfire where practicable. They actively participate in Integrated Pest Management (PMS) to salvage dead or unhealthy stands to reduce fire hazard.

No Nonconformities, but one Opportunity for Improvement was identified related to this objective.

• The organization may wish to consider adding more detail of wildfire's undesirable impacts on their SFI Forest lands into their Fire Hazard Assessment Standard.

Objective 11. 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 (WFP Trained Logger List –SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR –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 12. 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.

Reviewed in the field for 2023

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

Objective 13. 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, WFP Trained Logger List –SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR

Summary: WFP have a Sustainable Forest Management policy. 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, but one Opportunity for Improvement was identified related to this objective.

• The organization could consider additional SFI refresher training and/or develop certification handbooks for their harvest contractors.

Objective 14. 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, 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 15. 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, 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 16. Communications and Public Reporting To increase transparency and to annually report progress on conformance with the SFI 2022 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 17. Management Review and Continual Improvement To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

Evidence: Interviews with WFP staff. MERC Management Review 2022 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.

An annual MERC meeting is required by their procedures with one being conducted in the past year. 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. 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 | Evidence of Conformity |
|------------------------------------|--|
| Objective 1. | Evidence : Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI |
| Biodiversity in | Certification Matrix, SFI Fibre Sourcing Information Package, SFI FS Risk Assessment, WFP |
| Fiber Sourcing | FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms |

To address the practice of sustainable forestry by conserving biological diversity.

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, but one Opportunity for Improvement was identified related to this objective.

• The organization may wish to revise some language of their risk assessment to better align with the SFI standard.

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.

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

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, WFP Trained Logger List – 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, but one Opportunity for Improvement was identified related to this objective.

• The organization could consider reviewing the recently developed SIC logger training program to replace or enhance their own program.

Objective 4. Legal and Regulatory Compliance To comply with applicable federal,

provincial, state

regulations.

and local laws and

Evidence: Interviews with WFP staff and contractors. Review of WFP Appendix 10 - SFI Certification Matrix, SFI Fibre Sourcing Information Package, WFP Trained Logger List – SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR, 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. Forestry

Reviewed in the field for 2023

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.

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, WFP Trained Logger List –SFI FS Risk Assessment, WFP FSC Risk Assessments, WFP CoC Procedures V.1, WFP WCSIC Risk Assessment forms, WFP MERC MR

Summary: WFP have a Sustainable Forest Management policy. 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 Out of Scope in 2023

Outreach

To broaden the practice of sustainable forestry through public outreach, education and involvement. and to support the efforts of SFI **Implementation** Committees.

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

Objective 8. Public Land Management Responsibilities To participate and

implement

management on public lands.

sustainable forest

Out of Scope in 2023

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

Objective 9. **Communications** and Public Reportina

To increase transparency and to annually report progress on conformance with the SFI 2022 Fiber Sourcing 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. 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 practice of sustainable forestry by conducting a management review and monitoring performance.

Evidence: Interviews with WFP staff. MERC Management Review 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.

An annual MERC meeting is required by their procedures with two being conducted in the past year. 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. These audits consisted of a mix of remote document review and interviews conducted by a qualified thirdparty 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. | | |
|--|--|--|
| Objective 11. | Evidence: WFP Policies, Interviews with staff, WFP SFI FS Evidence Package, Procurement | |
| Avoid | Summary Report, Procurement contracts | |
| Controversial | | |
| Sources | Summary: WFP has mechanisms in place to control and monitor the sourcing of fiber areas | |
| To manage the risk | to ensure no ineligible inputs come into the system from biological diversity, biodiversity | |
| of sourcing fiber | hotspots, and high-biodiversity wilderness areas. | |
| from controversial | | |
| sources | | |

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

Specific good management practices are noted below:

- Harvest contractors observed on Mainland Coast Operations have excellent document controls in place and were very organized throughout the assessment.
- WFP has developed and implemented a comprehensive carbon modelling program providing detailed carbon tracking of their organization's Scope 1, 2 and 3 emissions. This reporting has received third party verification.

Conclusion

The Company has maintained conformance with the requirements of the Sustainable Forestry Initiative Fiber Sourcing Standard [2022] and the Sustainable Forestry Initiative Forest Management Standard [2022]. 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: wsloan@westernforest.com/responsibility/environment/certification/

The next SFI Assessment will be a Maintenance Assessment in the Summer of 2024. The registration expires on November 5, 2026.