

# RISK ASSESSMENT FOR MULTI-SITE CHAIN OF CUSTODY & CONTROLLED WOOD CERTIFICATE (FSC STANDARD 40-005 V2.1)

<b>Certificate Holders:</b>	West Fraser Mills Ltd	<b>Certification Body (CB):</b>	KPMG FSCI
<b>FSC CW certificate code:</b>	KF-COC/CW-001045	<b>Date of CB approval:</b>	June 16, 2011
<b>Date of risk assessment:</b>	May 20 <sup>th</sup> , 2011	<b>Address of CB:</b>	Box 10426 777 Dunsmuir Street, Vancouver, BC V7Y 1K3
<b>Certificate holder address:</b>	1250 Brownmiller Rd, Quesnel, BC, Canada V2J 6P6		

Participating Sites	Site Address	Multi-Site Certificate Identifier
Quesnel River Pulp	1000 Finning Road, Quesnel, BC, Canada V2J 6A1	QRP
Cariboo Pulp and Paper Company	PO 7500, 50 North Star Rd, Quesnel, BC, Canada V2J 3J6	CPP
Hinton Pulp	760 Switzer Dr, Hinton, AB, Canada T7V 1V7	HP
Slave Lake Pulp	PO Box 1790, Slave Lake, AB, Canada T0G 2A0	SLP
WestPine MDF	300 Carradice Rd, Quesnel, BC, Canada V2J 5Z7	WPM
Ranger Board	PO Box 2000, Whitecourt, AB, Canada T7S 1P9	RBD
West Fraser Sales Ltd	501 - 858 Beatty St, Vancouver, BC, Canada V6B 1C1	WFS

<b>Districts, including countries covered with this risk assessment:</b>	<p>For the purpose of FSC-STD-40-005 V2.1 the fibre supply District of the combined participating sites are those portions of the ecoregions<sup>1</sup> listed below that are located within the provinces of Alberta and British Columbia.</p> <ul style="list-style-type: none"> <li>• Fraser Plateau and Basin Complex</li> <li>• North Central Rockies Forest</li> <li>• Cascade Mountains Leeward Forests</li> <li>• Central British Columbia Mountain Forests, and</li> <li>• Okanagan Dry Forests</li> <li>• Alberta-British Columbia Foothills Forests</li> <li>• Alberta Mountain Forests</li> <li>• Canadian Aspen Forests and Parklands</li> <li>• Mid-Continental Canadian Forests, and</li> <li>• Northern Cordillera Forests</li> </ul>
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<sup>1</sup> World Wildlife Fund – US, Terrestrial Ecosystems of the World, 2004, URL:<http://www.worldwildlife.org/science/data.cfm>

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Category	FSC Indicator	Information Sources	Rationale	Risk Determination
<b>1. Illegally Harvested Wood.</b>  The district of origin may be considered low risk in relation to illegal harvesting when all the following indicators related to forest governance are present:	1.1 Evidence of enforcement of logging related laws in the district  1.2 A robust and effective system of licensing, harvest permits, and other documentation demonstrating legality of harvests and wood purchases are present in the district.	AB: <a href="http://www.srd.alberta.ca/MapsFormsPublications/Publications/Legislation.aspx">http://www.srd.alberta.ca/MapsFormsPublications/Publications/Legislation.aspx</a>  <a href="http://www.srd.alberta.ca/ManagementPrograms/ForestManagement/ForestManagementDirectives/ComplianceEnforcement.aspx">http://www.srd.alberta.ca/ManagementPrograms/ForestManagement/ForestManagementDirectives/ComplianceEnforcement.aspx</a>  BC: <a href="http://www.for.gov.bc.ca/tasb/legregs/comptoc.htm">http://www.for.gov.bc.ca/tasb/legregs/comptoc.htm</a>  <a href="http://www.for.gov.bc.ca/hen/">http://www.for.gov.bc.ca/hen/</a>	Strong legislation is in place in Alberta and BC regarding the granting and regulation of harvesting rights and the marking, scaling and transportation of timber. Both Alberta and BC have government staff dedicated to the monitoring of compliance with and to enforce forest Acts and Regulations by forest companies.	<b>Low Risk</b>
	1.3 Little or no evidence or reporting of illegal logging in the district of origin.	<a href="http://www.illegal-logging.info/">http://www.illegal-logging.info/</a>  AB: <a href="http://www.srd.alberta.ca/ManagementPrograms/ForestManagement/ForestManagementDirectives/ComplianceEnforcement.aspx">http://www.srd.alberta.ca/ManagementPrograms/ForestManagement/ForestManagementDirectives/ComplianceEnforcement.aspx</a>  BC: <a href="http://www.for.gov.bc.ca/hen/">http://www.for.gov.bc.ca/hen/</a>	There is no reporting of illegal logging in BC or Alberta.  West Fraser has contracts or declarations stating that no fibre is coming from an illegal source for the Company's entire Canadian supply chain	
	1.4 Low perception of corruption related to harvesting permits and related law enforcement.	<a href="http://www.transparency.org/">http://www.transparency.org/</a>	As per Transparency International's 2010 Transparency International Corruption Perceptions Index (Transparency International, 2009), Canada ranks as the 6 <sup>th</sup> least corrupt country in the world with a rating of 8.9. Canada ranks lower than Denmark, the least corrupt, but higher than the US, the 22 <sup>nd</sup> least corrupt.	

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<p><b>2. Wood harvested in violation of traditional or civil rights.</b></p> <p>The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when all the following indicators are present:</p>	2.1 There is no UN Security Council ban on timber exports from the country concerned	<a href="http://www.un.org/en/">http://www.un.org/en/</a>	There is no mention on UN site of a UN Security Council ban on timber sourced from Canada.	<b>Low Risk</b>
	2.2 The country or district is not designated a source of conflict timber (e.g USAID Type 1 conflict timber)	<a href="http://www.illegal-logging.info/">http://www.illegal-logging.info/</a> <a href="http://www.globalpolicy.org/security/natres/timbrindex.htm">http://www.globalpolicy.org/security/natres/timbrindex.htm</a> AB: <a href="http://www.srd.gov.ab.ca/">http://www.srd.gov.ab.ca/</a> BC: <a href="http://www.gov.bc.ca/for/">http://www.gov.bc.ca/for/</a>	Canada is not designated as a source of conflict timber	
	2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned	Canada: <a href="http://laws.justice.gc.ca/en/L-2/">http://laws.justice.gc.ca/en/L-2/</a> AB: <a href="http://employment.alberta.ca/SFW/996.html">http://employment.alberta.ca/SFW/996.html</a> BC: <a href="http://www.labour.gov.bc.ca/esb/">http://www.labour.gov.bc.ca/esb/</a>	Canada, BC, and Alberta have strong federal and provincial labour legislation. As such there is no evidence of child labour or violation of ILO Fundamental Principles and Rights at work taking place in the forest related workplaces.	
	2.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned.	Canada: <a href="http://www.ainc-inac.gc.ca/al/index-eng.asp">http://www.ainc-inac.gc.ca/al/index-eng.asp</a> AB: <a href="http://www.aboriginal.alberta.ca/1.cfm">http://www.aboriginal.alberta.ca/1.cfm</a> BC: <a href="http://www.gov.bc.ca/arr/">http://www.gov.bc.ca/arr/</a> <a href="http://www.for.gov.bc.ca/haa/">http://www.for.gov.bc.ca/haa/</a>	<p>The courts of Canada have established a legally binding consultation system. There is a process in place with both the governments of Canada and the provinces to negotiate and implement land claims and self government agreements. Many First Nations have treaties with the government of Canada.</p> <p>Alberta has a First nation consultation policy that must be followed by industry. Approvals are dependent upon adequate First Nations consultation.</p> <p>In BC the Forest and Range Practices Act requires efforts to be made in information sharing between industry and First Nations as a means to identify and where necessary conserve or protect cultural heritage resources.</p>	

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<p><b>3. Wood harvested from forest in which high conservation values are threatened by management activities.</b></p> <p>The district of origin may be considered low risk in relation to threat to high conservation values if: a) indicator 3.1 is met; or b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by noncompliance with 3.1.</p>	<p>3.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant high conservation values.</p> <p>3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.</p>	<p><a href="http://www.worldwildlife.org/science/ecoregions/item1847.html">http://www.worldwildlife.org/science/ecoregions/item1847.html</a></p> <p><a href="http://www.fsccanada.org/docs/37b60f3055cda17c.pdf">http://www.fsccanada.org/docs/37b60f3055cda17c.pdf</a></p> <p><a href="http://www.conservation.org/Pages/default.aspx">http://www.conservation.org/Pages/default.aspx</a></p> <p><a href="http://www.cbd.int/countries/?country=ca">http://www.cbd.int/countries/?country=ca</a></p> <p>British Columbia: Identified Wildlife Management Strategy: <a href="http://www.env.gov.bc.ca/wld/frpa/iwms/wha.html">http://www.env.gov.bc.ca/wld/frpa/iwms/wha.html</a></p> <p>BC Caribou Recovery Plan: <a href="http://www.env.gov.bc.ca/wld/speciesconservation/mc/index.html">http://www.env.gov.bc.ca/wld/speciesconservation/mc/index.html</a></p> <p>Central British Columbia Mountain Forests Ecoregion Strategic Land and Resource Management Plans: <a href="http://archive.ilmb.gov.bc.ca/slrp/lrmp/">http://archive.ilmb.gov.bc.ca/slrp/lrmp/</a></p> <p>Fort St. James LRMP Fort St James SRMP Mackenzie LRMP Fort St. John LRMP Dawson Creek LRMP Prince George LRMP</p> <p>Cascade Mountains Leeward Forests Ecoregion Strategic Land and Resource Management Plans: <a href="http://archive.ilmb.gov.bc.ca/slrp/lrmp/">http://archive.ilmb.gov.bc.ca/slrp/lrmp/</a></p> <p>Cariboo-Chilcotin LUP Anaheim Round Table SRMP Chilcotin SRMP Williams Lake SRMP South Chilcotin SRMP</p>	<p>The fiber supply District does not contain any of the presently identified critical/endangered WWF global 200 ecoregions.</p> <p>The fiber supply District does not contain any Conservation International biodiversity hot spots or high priority wilderness areas</p> <p>Canada is a signatory to the Convention on Biological Diversity.</p> <p>The fibre supply District does not contain any ecoregions identified by Global Forest Watch as having regionally or provincially significant intact forests that potentially are threatened by forest management activities, but does contain two ecoregions identified by Global Forest Watch as having globally significant intact forests that are potentially at risk of being threatened by forest management activities. These two ecoregions are the Cascade Mountains Leeward Forests ecoregion and the Central British Columbia Mountain Forests ecoregion. The participating sites that source fibre from these ecoregions are Quesnel River Pulp, Cariboo Pulp and Paper and WestPine MDF. [Note: The assessment made by Global Forest Watch is conservative as it does not take into account any level of protection or conservation within the forest tenures in the form of protected areas, special areas where harvesting is deferred or not permitted, and non-commercial forest where harvesting will not occur.] Strategic Land and Resource Management Plans have been developed for all Crown forest lands within both the Central British Columbia Mountain Forest and Cascade Mountains Leeward Forests ecoregions. These plans provide for a strong system of protection through mechanisms such as Old Growth Management Areas, protected areas, special resource management zones, and objectives and strategies for key wildlife species, seral stages, and rare ecosystems.</p>	<p style="text-align: center;"><b>Low Risk at the Forest Management Unit (FMU) Level</b></p>

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(cont)	(cont)	<p>Lillooet LRMP Merritt SRMP (draft)</p> <p>Chilliwack SRMP (biodiversity chapter)</p> <p><u>Alberta:</u> AB Caribou Recovery Plan: <a href="http://www.srd.alberta.ca/BioDiversityStewardship/WildSpecies/Mammals/Deer/WoodlandCaribou.aspx">http://www.srd.alberta.ca/BioDiversityStewardship/WildSpecies/Mammals/Deer/WoodlandCaribou.aspx</a></p> <p>West Central Alberta Caribou Landscape Plan: <a href="http://www.albertacariboucommittee.ca/PDF/WCCLPT-Plan-05_06_08.pdf">http://www.albertacariboucommittee.ca/PDF/WCCLPT-Plan-05_06_08.pdf</a></p> <p>Alberta SRD Land Use Framework: <a href="http://landuse.alberta.ca/">http://landuse.alberta.ca/</a></p>	<p>BC: Additional protection is provided through the establishment by government of Wildlife Habitat Areas (WHA's) for species that fall under the Identified Wildlife Management Strategy, for example WHA's established in 2009 to protect Mountain Caribou.</p> <p>AB: No suppliers of virgin <i>controlled material</i> currently source fibre from within areas identified in the West Central Alberta Caribou Landscape Plan as core/primary woodland caribou range.</p> <p>Regional Plans are currently under development in Alberta through the Alberta SRD Land Use Framework that have objectives for biodiversity, including species at risk and an increase in conservation areas.</p>	(cont)

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<p><b>4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses</b></p> <p>The district of origin may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicator is present:</p>	<p>4.1 There is no net loss AND no significant rate of loss (&gt; 0.5% per year) of natural forests and other naturally wooded ecosystems such as savannahs taking place in the eco-region in question.</p>	<p>AB:  <a href="http://srd.alberta.ca/managingprograms/ForestManagement/documents/Forest-Resource-Ftsht.pdf">http://srd.alberta.ca/managingprograms/ForestManagement/documents/Forest-Resource-Ftsht.pdf</a></p> <p>BC:                      The State of British Columbia's Forests 2010  <a href="http://www.for.gov.bc.ca/hfp/sof/2006/pdf/sof.pdf">http://www.for.gov.bc.ca/hfp/sof/2006/pdf/sof.pdf</a></p>	<p>Both British Columbia and Alberta have a forest management regime based on natural forests and the use of native species. Plantation forestry as defined in the FSC Glossary of Terms (FSC-STD-01-002) is not practiced in British Columbia and Alberta. Alberta SRD states that the annual growth rate of Alberta's forest exceeds that annual approved harvest and actual harvest. The State of British Columbia's Forests 2010 report states that the current rate of forest conversion is very low.</p>	<p><b>Low Risk</b></p>
<p><b>5. Wood from forests in which genetically modified trees are planted</b></p> <p>The district of origin may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is complied with:</p>	<p>a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned</p> <p>b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use</p> <p>c) It is forbidden to use genetically modified trees commercially in the country concerned</p>	<p>AB:  <a href="http://abtreegene.com/">http://abtreegene.com/</a></p> <p>BC:  <a href="http://www.for.gov.bc.ca/hti/">http://www.for.gov.bc.ca/hti/</a></p>	<p>AB: No GMO trees have been planted in operational forest plantations on Crown lands in Alberta.</p> <p>BC: The Tree Improvement Branch of the Ministry of Forests &amp; Range ensures that no genetically modified tree seed is registered or used in operational forest planting on Crown land in British Columbia.</p>	<p><b>Low Risk</b></p>