

Does Nakina Lumber Inc meet FSC's Controlled Wood standard?

November 3, 2022

We are carrying out an audit of Nakina Lumber Inc located in Thunder Bay, Ontario, Canada to see if their operations comply with FSC's [Controlled Wood](#) standard (FSC-STD-40-005 V3-1). We are writing to you to ask if you know of any reason why their operations would not meet this standard.

Controlled Wood is wood that meets minimum requirements and that can therefore be mixed with FSC wood and used in products with an FSC Mix label. In particular, the wood must not be:

- harvested illegally.
- harvested in violation of traditional and civil rights.
- harvested from forests with a high conservation value that is threatened by management activities.
- harvested from forests being converted to plantations or non-forest use.
- from forests in which genetically modified trees are planted.

We will carry out our audit on November 23, 2022. Here is how you should comment, if you wish to do so:

- When? You should send comments to us before or during the audit.
- How? You can comment by .
 - Meeting with a Preferred by Nature staff member in person.
 - Phone to Angus McAuslan, Preferred by Nature staff member at (416) 882-5576
 - Writing to Angus McAuslan at PO Box 1771, Chelsea, QC J9B 1A1.
 - Email to Angus McAuslan at amcauslan@preferredbynature.org
 - In person by arranging to meet with Angus McAuslan
- If you want your comments to be confidential please notify us when you submit the comments.

If you provide comments, we will provide feedback to you within 30 days of the audit.

Nakina Lumber Inc has written a summary document that lists:

- the risks they have identified that they may source unacceptable wood
- the measures they implement to mitigate those risks.

We have attached this summary document to this letter.

If you wish to dispute any aspect of this forest certification process or the decision we reach as to whether this company meets the Controlled Wood standard, you can access our Dispute Resolution Policy at www.preferredbynature.org.

Thank you for any help you are able to provide.

If you have any recommendations for contacting other stakeholders that may have an interest in providing comments on this company and audit, we would also gladly receive these from you.

Yours sincerely,



Mélanie Proulx
Coordinator, Certification Support

FSC Controlled Wood Due Diligence System Public Summary

1. General information

Organisation name:	Nakina Lumber Inc.
FSC certificate code:	NC-COC-007803 NC-CW-007803 (RA-COC-007803)FSC License Code FSC-C139143
Organisation's DDS contact person:	Chantal Alkins
DDS prepared/assisted by:	Chantal Alkins Environmental Services Coordinator
Date last reviewed/updated (by the organisation):	October 26, 2021

2. Suppliers

Participating site	Non-certified material type sourced	Exact number of suppliers	Supplier type(s)	Average no. of tiers in the supply chains	Approximate or exact number of sub-suppliers
Nakina Lumber Inc.	Roundwood logs (W1.1.1) -- full tree length and 16-foot cut length	5	Primary processor, Secondary processor,	1	1

3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
Kenogami Forest	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
Ogoki Forest	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
Lake Nipigon Forest	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
Pic Forest (FSC Certified)	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk

4. Risk assessment and mitigation

4.a Risk mitigation for the origin of the material

Supply area: Kenogami Forest, Ogoki Forest, Lake Nipigon Forest & Pic Forest (FSC Certified)		
Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.1	Low Risk For Canada	
1.2	Low Risk For Canada	
1.3	Low Risk For Canada	
1.4	Low Risk For Canada	

1.5	Low Risk For Canada	
1.6	Low Risk For Canada	
1.7	Low Risk For Canada	
1.8	Low Risk For Canada	
1.9	Low Risk For Canada	
1.10	Low Risk For Canada	
1.11	Low Risk For Canada	
1.12	Low Risk For Canada	
1.13	Low Risk For Canada	
1.14	Low Risk For Canada	
1.15	Low Risk For Canada	
1.16	Low Risk For Canada	
1.17	Low Risk For Canada	
1.18	Low Risk For Canada	
1.19	Low Risk For Canada	
1.20	Low Risk For Canada	
1.21	Low Risk For Canada	
Controlled wood category 2. Wood harvested in violation of traditional and human rights		
2.1	Low Risk For Canada	
2.2	Low Risk For Canada	
2.3	Specified Risk Wood harvested in violation of traditional and human rights Control Measures: 1. Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan. Control Measure Statement: There is no active litigation, blockade, protest or other significant conflict of substantial magnitude in the supply area. Control Measure Verification: An assessment was conducted on November 19, 2021 to ensure that there are no significant conflicts in the supply area. The results of this assessment indicate no non-conformities whereas there are no significant conflicts within the supply area. In order to maintain this control measure, this assessment will be conducted on a bi-annually cycle in May and November. Should any non-conformities be found in the future, an action plan to address the non-conformities shall be implemented. The search is conducted utilizing the below references:	

Ontario Court of Justice: [Ontario Court of Justice](#) ; Environmental Registry of Ontario: [EBR](#) National News Outlets: [CBC News](#); Local News Outlets: [Thunder Bay News Watch](#); [Chronicle Journal](#) and [APTN News](#).

All of the Crown forests in the above listed supply areas are managed by or have forest resource licences held by First Nation-owned resource management companies. In addition, In Ontario, First Nation and Metis communities are provided the opportunity to participate on the planning teams for Forest Management Units (FMU)s. The Ministry of Natural Resources and Forestry (MNRF) provides a separate Consultation Program at the request of the First Nations as per “Aboriginal Involvement in Forest Management Planning”, FMPM - Part A, Section 4.0. Disputes arising during the development of the FMP are addressed through the FMP Issue Resolution Procedure, FMPM 3.4. Prescriptions are developed to address concerns, in the FMP as Operational Prescriptions for Areas of Concern. Forest Management Guides have been developed for the processes, such as the [Forest Management Guide for Cultural Heritage Values](#).

Kenogami Forest (FSC Certified)

This forest management unit is currently being managed under a Forest Resource Licence and Forestry Agreement held by Ne-Daa-Kii-Me-Naan Incorporated. Ne-Daa-Kii-Me-Naan Inc. (Nedaak) is a First Nation owned company established in 2012 to manage the Kenogami Forest and to provide economic development opportunities for surrounding First Nations and local communities. Board members of Nedaak are Constance Lake First Nation; Long Lake #58 First Nation; Aroland First Nation; Ginoogaming First Nation; Red Rock Indian Band; Pays Plat First Nation, and; Animbiigoo Zaagi igan Anishinaabek. See [Nedaak Website](#)

Pic Forest (FSC Certified)

The Pic Forest is an amalgamation of the Big Pic and Pic River Forest Management Units. In April 2013, the Nawiinginokiima Forest Management Corporation was granted a Forest Resource Licence and became the first Local Forest Management Corporation to be established pursuant to the Ontario Forest Tenure Modernization Act, 2011. The Nawiinginokiima Forest Management Corporation is a Crown Corporation established to operate within a defined management area that includes the communities of the Ojibways of the Pic River First Nation, Pic Mobert First Nation, Hornepayne Aboriginal community, Marathon, Hornepayne, Manitouwadge and White River. The Nawiinginokiima Forest Management Corporation will continue to be the Sustainable Forest Licence holder when the units are amalgamated in 2019. See [Nawiinginokiima Forest Management Corporation Website](#)

Lake Nipigon Forest

Lake Nipigon Forest Management Inc. (LNFMI) has the only First Nation-run Sustainable Forestry License (SFL) in the province, and they manage almost one million hectares of forestlands in the Lake Nipigon forest region. LNFMI is owned by four First Nation communities: Animbiigoo Zaagi’igan Anishinaabek, Bingwi Neyaashi Anishinaabek, Biinjitiwaabik Zaaging Anishinaabek and the Red Rock Indian Band. LNFMI is responsible for planning, reporting and implementing all forestry operations on the SFL. See [LNFMI](#)

	<p>Ogoki Forest Agoke Development Limited Partnership (ADLP) manages the Ogoki Forest. ADLP is a forestry company owned by the First Nations of Aroland, Eabametoong and Marten Falls. ADC delivers services including forest management, harvesting, road construction, road maintenance and training. ADLP has a Forest Resource Licence and a Forestry Agreement on the Ogoki. ADLP allows for community members to have input and opportunities in the forestry sector. In 2018, ADC received the NADF Business Partnership of the Year award for its work in the Ogoki Forest.</p>	
Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities		
3.1	<p>Specified Risk for the following Eco Regions in the supply area: Midwestern Canadian Shield forest (50); Central Canadian Shield forests (43), and; Eastern Forest – Boreal Transition (5)</p> <p>Control Measure for the Lake Nipigon Forest Portion of the Wood Supply: 9. The Organization implements a strategy to reduce sourcing over the next 5 years from areas of woodland caribou critical habitat* where management plans do not meet the Federal Recovery Strategy. Guidance: Management plans that ‘meet the Federal Recovery Strategy’ would apply in areas where Control Measure #3, 7 or 10 are met. And. The Organization acts within their sphere of influence to publicly advocate to the relevant decision makers at the government level and other relevant forest industry partners about the need to finalize and implement legal requirements that meet the Federal Recovery Strategy.</p> <p>Control Measure Statement: Strategy to reduce sourcing over 5 years: NLI has allowed for 40% of its wood basket SPF to be procured from the Lake Nipigon Forest. Moving forward, LLI will reduce its supply by 20% over the next five years.</p> <p>Control Measure Verification: Evidence for #9-Lake Nipigon Forest <u>No fibre has been sourced from the Lake Nipigon Forest in 2021.</u> A strategy is in place as per statement above.</p> <p>Control Measure for the Ogoki Portion of the Wood Supply: 8. Evidence demonstrates that forests in the sourcing area have a management plan that contributes to the recovery of woodland caribou critical habitat*, as identified in the Federal Recovery Strategy. The management plan identifies and implements:</p> <p>a) Best Management Practices (BMPs) that reduce disturbance to and restore critical habitat* including, but not limited to:</p> <ul style="list-style-type: none"> • access management (e.g. road decommissioning, integrated access plans, restoration of linear features); OR • aggregate harvesting (i.e. harvest scheduling to minimize disturbance footprint). <p>OR</p>	

b) Harvest deferrals, set asides, and/or protection areas² within areas of critical habitat*, where forest operations are not permitted.

Rationale is provided as to how such actions will contribute to reducing the level of disturbance over time in critical habitat*, in support of meeting the threshold requirements in the Federal Recovery Strategy.

Control Measure Statement:

The Crown Forest Sustainability Act (CFSA) and the Forest Management Planning Manual (FMPM) provide protection processes, while Forest Management Plans (FMP) identify specific values and specific operational prescriptions to protect values (caribou) in Ontario Forests. The 2014 guidelines under the CFSA require forest managers to follow a Dynamic Caribou Habitat Schedule (DCHS) to support management decisions to ensure a sustainable supply of caribou habitat over space and time. Ontario has a robust sustainable forest management framework that includes regulatory tools and legal instruments that, in their application, contribute to the sustainability of woodland caribou.

Control Measure #8, is implemented in the Forest Management Planning processes as documented in the FMPs for the sourcing area. These plans comply with Ontario's Forest Management Planning Manual (FMPM). Forest Management Plans in Ontario are developed by highly skilled teams of Registered Professional Foresters (RPFs), biologists, silviculture foresters, GIS experts and local stakeholders.

The planning team for the Ogoki Forest includes individuals in the following rolls: Project Manager and Chair Regional Planning Forester; Plan Author; General Manager; Management Forester; Management Biologist; Resource Liaison Specialist; Regional Planning Biologist; President and Forest Resource Licence Holder Representative (Indigenous Owned Organization); Director, Forest Resource Licence Holder Representative (Indigenous Owned Organization); Nakina Lumber Inc.; Columbia Forest Products; Geraldton Area Natural Resources Advisory Committee; LCC Representative Geraldton Area Natural Resources Advisory Committee; LCC Representative; Marten Falls First Nation First Nation Community Representative; Eabametoong First Nation-First Nation Community Representative; Animiigoo Zaagi'igan Anishinaabek-First Nation Community Representative; Aroland First Nation First Nation Community Representative; GreenForest Management Inc. Operations/Planning Forester; Ginoogaming First Nation-First Nation Community Representative, and; Long Lake #58 First Nation-First Nation Community Representative.

These skilled teams use a number of tools in the planning processes such as, enhanced eFRI, Ontario's Landscape Tool (OLT); Caribou Habitat Landscape Guide Indicators; Inventories and Information for Species at Risk, Endangered and Threatened Species and Special Concern Species as well as values information including First Nation values. Planning teams produce value maps for the protection of values in Area of Concern's (AOC)s.

Planning is centered around balancing objectives, one of them being Forest Diversity and Provision of Forest Cover for habitat for forest dwelling woodland caribou within local population ranges. The planning team aims to create/maintain a suitable supply and arrangement of large forest patches of forest area in within the caribou distribution range, through the retention and harvest of

Dynamic Caribou Habitat Schedule (DCHS) blocks through time. The planning team follow guidelines that emphasize the maintenance of woodland caribou habitat through the implementation of the DCHS. They also utilize best information available, Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR) direction and guides, new information brought forward by stakeholders and local knowledge.

First Nation representatives on the planning team also brings information back to the communities to gain input in the development of the FMP, First Nation representatives coordinate the gathering of data from the information centres within the communities.

The forests in the sourcing area all have approved FMPs. The FMPs identify and implement protection processes, operational prescriptions and best management practices (BMPs) that aim to protect values. The plans contain detail on habitat and disturbance assessments, as well identifying other species and landscape features that contribute to caribou conservation. The FMP process includes the effective engagement of stakeholders and Indigenous Peoples through several different meaningful consultation processes. These and the other planning tools available to resource managers are outlined below.

Ontario has taken steps to incorporate and contribute to new science and information used to manage caribou habitat. In addition, the Province has made an effort to consult with stakeholders and Indigenous Peoples on caribou conservation that is consistent with the Range Plan Guidance for Woodland Caribou, Boreal Population (ECCC 2016), and these initiatives are evidenced by Ontario Critical Habitat Reports (2018 & 2019) outlined below.

Control Measure Verification:

This Control Measure is verified by an assessment of the legal forest management framework and presenting the evidence and rationale regarding the Forest Management Planning Processes in the sourcing areas. Ontario has a robust sustainable forest management framework. There are numerous planning tools available for forest management planning teams and practitioners in the planning processes as outlined below. The supply area forests are **First Nation managed forests** that have approved forest management plans that are produced under the guidance of the Ontario's Woodland Caribou Conservation Plan and Forest Management Guide for Boreal Landscapes. These plans, BMPs and guidance documents direct forest management planning teams to include access management and aggregate harvest/anthropogenic disturbance.

Harvest deferrals are identified within the Dynamic Caribou Habitat Schedule (DCHS), and within the deferral areas forestry operations are not permitted Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR) have recently identified geographic areas that are frequently used for calving and nursery areas and have applied a protection prescription to ensure minimum disturbance during spring and early summer. The DCHS pattern aggregates harvest and emulates natural disturbance patterns. Reforestation and restoration are evidenced in all approved FMPs in the continuous caribou range in Ontario.

Ontario is working towards incorporating and contributing to new science and information used to manage caribou habitat. In addition the Province has made an efforts to consult with stakeholders and Indigenous Peoples on caribou conservation.

In order to maintain this control measure, an assessment will be conducted annually during the internal audit processes to determine any updates to the evidence listed below. Should any non-conformities be found in the future, an action plan to address the non-conformities shall be implemented. The assessment will be conducted utilizing the below references:

Evidence for verification of the Control Measure # 8 are contained in the following appendices of the Company's Due Diligence System:

Appendix A

References to Sections of the Ogoki Forest Forest Management Plan

Appendix B

Ogoki Forest FMP

Appendix C

IFL Assessment the Ogoki Forest

Other Regulatory Evidence and The Sustainable Forest Management Framework as verification of the Control Measure # 8 is listed below:

[Bill 229](#)

Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020 Schedule 8 Crown Forest Sustainability Act, 1994. The Schedule repeals provisions of the Crown Forest Sustainability Act, 1994 that address when forest management plans are deemed to include certain parts of agreements or regulations under the Endangered Species Act, 2007 and related matters.

A new section is added to the Act providing that a person is exempt from certain provisions of the Endangered Species Act, 2007 while conducting forest operations in a Crown forest, in accordance with an approved forest management plan, and on behalf of the Crown or under the authority of a forest resource licence. Currently, similar provisions are included in a regulation made under the Endangered Species Act, 2007.

[Crown Forest Sustainability Act, 1994, S.O. 1994, c. 25](#)

[CFSA O. Reg. 167/95: GENERAL](#)

[O. Reg. 160/04: INDEPENDENT FOREST AUDITS](#)

The CFSA provides for the sustainability of Crown forests where it establishes requirements around forest management planning and forest resource licencing. More specifically, the Act ensures that forest operations are undertaken in accordance with approved manuals. Content of the manuals is regulated to implement forest operations on Crown Land (Forest Management Planning Manual, Forest Information Manual, Forest Operations and Silviculture Manual, Scaling Manual) as well as transitional provisions for forest management plans, annual work schedules, and licences.

While the CFSA regulates crown charges; terms and conditions of forest resource licences and overlapping licenses; amendments, cancellations and transfers of forest resource licenses; scaling licences; licences for forest resource processing facilities, they also regulate the manuals to implement forest operations on Crown Land.

In terms of monitoring, the planning framework includes Independent forest audits to ensure that each management unit in the province is audited every 5 to 7 years. An independent auditor assesses the performance of both the sustainable forest licence holder and the MNRF in meeting their forest management responsibilities. The ministry and industry then respond to audit findings and recommendations by preparing action plans and status reports.

The scientific basis for managing caribou habitat continues to evolve in Ontario. While Ontario does not yet have a Range Management Plan, the Province implements a range management approach through the Range Management Policy in Support of Woodland Caribou Conservation and Recovery. The Range Management Policy aims to manage cumulative disturbance at a level that supports self-sustaining caribou populations and manages the amount and arrangement of habitat consistent with levels that have been estimated to occur in natural landscapes. Caribou management is applied through Ontario's Woodland Caribou Conservation Plan and subsequent Best Management Practices for Aggregate Activities and Woodland Caribou in Ontario. Ontario has taken steps to incorporate and contribute to new science and information used to manage caribou habitat. In addition the Province has made an effort to consult with stakeholders and Indigenous Peoples on caribou conservation that is consistent with the Range Plan Guidance for Woodland Caribou, Boreal Population (ECCC 2016), and these initiatives are evidenced by Ontario Critical Habitat Reports (2018 & 2019) outlined below.

[Ontario's Woodland Caribou Conservation Plan](#)

This plan has been developed to meet the requirements under subsection 11(8) of the ESA, 2007, to identify and prioritize the actions the government intends to take in response to the final Recovery Strategy for Woodland Caribou (forest-dwelling, boreal population) in Ontario, published August 21, 2008. To develop the Caribou Conservation Plan, the MNRF considered the advice provided in the Caribou Recovery Strategy, the recommendations of the Woodland Caribou Science Review Panel and input received from the public, stakeholders and Aboriginal Peoples through several stakeholder sessions and through the Environmental Registry.

[Range Management Policy in Support of Woodland Caribou Conservation and Recovery](#)

The Range Management Policy provides a transparent and evidence-based approach to planning and decision-making in caribou habitat that maintains or improves the condition of caribou ranges in Ontario. It directs the implementation of the Range Management Approach and enables industry to proceed with development in a way that complies with the Endangered Species Act (ESA).

[Best Management Practices for Aggregate Activities and Woodland Caribou in Ontario](#)

[Report of the Ontario Woodland Caribou Science Review Panel: The Path Forward](#)

The purpose of this panel is to assist the public, stakeholders and Aboriginal Peoples in providing input into the development of the Caribou Conservation Plan. The MNRF developed a discussion paper titled, Keeping Caribou in Ontario. The public was invited to complete and submit their responses to a questionnaire between August 21 and September 26, 2008. Responses were considered when developing the draft Caribou Conservation Plan and the proposed habitat regulation for forest-dwelling Woodland Caribou.

The Crown Forest Sustainability Act (CFSA) and the Forest Management Planning Manual (FMPM) provide protection processes, while Forest Management Plans (FMP) identify specific values and specific operational prescriptions to protect values (caribou) in Ontario Forests. The 2014 guidelines under the CFSA require forest managers to follow a *Dynamic Caribou Habitat Schedule* to support management decisions to ensure a sustainable supply of caribou habitat over space and time. Ontario has a robust sustainable forest management framework that includes regulatory tools and legal instruments that, in their application, contribute to the sustainability of woodland caribou.

The forests in the sourcing area all have Approved Forest Management Plans (FMP). The FMPs identify and implement protection processes, operational prescriptions and best management practices (BMPs) that aim to protect values. The plans contain detail on population, habitat and disturbance assessments, as well identifying other species and landscape features that contribute to caribou conservation. The FMP process includes the effective engagement of stakeholders and Indigenous Peoples through several different meaningful consultation processes. These and the other planning tools available to resource managers are outlined below.

In addition to all of the above, Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) (O. Reg. 242/08) provides for regulatory exemptions for forest operations in Crown forests has an extension until to June 30, 2021.

[2019 Ontario Critical Habitat Reports for Woodland Caribou Boreal Population](#)

-Continued development of a management approach for the Lake Superior Coast range (i.e., the Coastal range) and Discontinuous Distribution. An Indigenous and stakeholder workshop was held in March 2019 to provide background information about boreal

caribou in the Lake Superior Coast range and Discontinuous Distribution and to discuss and obtain feedback to inform the development of a management approach for this range.

-Under the Ontario Forest Management Guide for Boreal Landscapes, continued incorporation of requirements for the management of boreal caribou habitat through space and time, including the development of a Dynamic Caribou Habitat Schedule, into forest management plans that intersect with boreal caribou ranges. Individual management plans are at various stages of completion depending on plan renewal schedules.

-Ongoing monitoring of the translocated caribou in the Lake Superior Coast range, and monitoring collars were deployed in the Ozhiski range (part of the Far North range) in March 2019.

-Collaboration and increased knowledge for boreal caribou conservation, through continuation of Ontario-funded stewardship and research projects. For example, the Wildlife Conservation Society of Canada is examining the relationship between disturbance and site fidelity, at multiple scales, by boreal caribou in Ontario.

-Ongoing boreal caribou habitat mapping work to delineate Category 1 high use areas (nursery and winter use areas).

-Continued implementation of the Range Management Policy in Support of Woodland Caribou Conservation and Recovery, including the detailed assessment of potential adverse effects on caribou and their habitat and the identification of avoidance, mitigation, and conditions for authorization.

Additional steps taken in Ontario

Initiatives to support recovery and protection outcomes for boreal caribou and its critical habitat in the province are also being led by Indigenous governments, organizations and communities, and stakeholders. In 2018 to 2019, ECCC funded four Indigenous-led projects, two stakeholder-led projects, and one multi-partner table. NRCan also funded one Indigenous-led project in Ontario. These projects focused on collection of Indigenous Knowledge and scientific research, conservation planning, creation of protected areas, engagement, and population and habitat monitoring.

For example, Matawa First Nations Management tribal council is conducting a two-year project focused on knowledge gathering, research, and capacity building on boreal caribou within the traditional territory of the Matawa Member First Nations. Beginning in December 2018, delegates from nine member communities gathered to discuss current boreal caribou research and data, collection of Indigenous Knowledge and "caribou stories," future research interests, and environmental monitoring. This information will contribute to a video, Story Map and hardcopy publications that will become valuable communication tools for community impact assessment work and informed decision-making. Community outreach sessions, which targeted youth and

interested community members, occurred in two First Nation communities, and included lessons on caribou ecology, research, and species at risk status.

Boreal caribou recovery in Ontario benefits from the work of multi-partner groups that are keen to build partnerships to further boreal caribou conservation and recovery. Collaborative projects, including in the Kesagami range, supported by ECCC, and in the Brightsand and Churchill ranges, aim to contribute to landscape-level planning, identify protected area opportunities, and incorporate multi-species considerations.

Canada and Ontario have made advancements and are continuing to engage on the negotiation of a draft conservation agreement under Section 11 of SARA for boreal caribou in the province. The agreement would codify measures of relevance to the protection and recovery of the species and its critical habitat.

2018 Ontario Critical Habitat Reports for Woodland Caribou Boreal Population

-in 2013, Ontario published the General Habitat Description for the Forest-dwelling Woodland Caribou (*Rangifer tarandus caribou*), a technical document that provides greater clarity in relation to the habitat protected under the Endangered Species Act, 2007 (ESA)

-in 2014, the Government of Ontario released its Range Management Policy in Support of Woodland Caribou Conservation and Recovery, which describes how the Government of Ontario will make coordinated planning decisions to maintain or improve boreal caribou range conditions. The policy applies to all ranges except the Coastal range (ON6). The policy describes a Range Management Approach, the implementation of which Ontario considers to be its approach to province-wide range planning

-with respect to the Coastal range (ON6), where Ontario's Range Management Policy in Support of Woodland Caribou Conservation and Recovery does not apply, Ontario has been working since 2016 to develop a policy approach for managing the range that is consistent with the direction outlined in Ontario's Woodland Caribou Conservation Plan

-the 2014 Forest Management Guide for Boreal Landscapes, under the authority of the CFSA, set caribou-specific habitat objectives that direct forest managers to manage the quality, quantity and arrangement of caribou habitat, and which included a mapped "Dynamic Caribou Habitat Schedule" to support management decisions to ensure a sustainable supply of caribou habitat over space and time. Any new forest management plans scheduled for implementation on or after April 1, 2017, are required to follow the guidance outlined in the 2014 Forest Management Guide for Boreal Landscapes

-with respect to forest management planning in Crown forests, Ontario has been evaluating and conducting targeted consultations on options to better integrate the requirements of the ESA and CFSA, following expiry of the related ESA regulatory exemption

-in the Far North Planning Area, Ontario is working with First Nations on the development of community based land use plans under the Far North Act, which include the identification of dedicated protected areas, working towards the objective of 225,000 km² of interconnected protected areas in the Far North of Ontario. These dedicated protected areas are expected to include areas of valuable caribou habitat. Five plans have been approved to date, and eight more are under development

-the province of Ontario has made significant investments into science and monitoring work, including work under the Collaborative Provincial Caribou Research Program, which could lead to further advancements in protection and recovery of boreal caribou in Ontario

Prior to, during, and since the 5-years mentioned above, Ontario has made significant investments (over \$11 million) in taking many important and positive steps for caribou recovery guided by its Woodland Caribou Conservation Plan, 2009.

In March 2018, Ontario posted a discussion paper, Seeking Advice on the Future of Caribou in the Lake Superior Coast Range to obtain public input to inform the development of a management approach for this range and the area of “Discontinuous Distribution” between this range and those further to the North.

The Sustainable Forest Management Framework

[Crown Forest Sustainability Act, 1994, S.O. 1994, c. 25](#)

[CFSA O. Reg. 167/95: GENERAL](#)

[O. Reg. 160/04: INDEPENDENT FOREST AUDITS](#)

The CFSA provides for the sustainability of Crown forests where it establishes requirements around forest management planning and forest resource licencing. More specifically, the Act ensures that forest operations are undertaken in accordance with approved manuals. Content of the manuals is regulated to implement forest operations on Crown Land (Forest Management Planning Manual, Forest Information Manual, Forest Operations and Silviculture Manual, Scaling Manual) as well as transitional provisions for forest management plans, annual work schedules, and licences.

While the CFSA regulates Crown charges; terms and conditions of forest resource licences and overlapping licenses; amendments, cancellations and transfers of forest resource licenses; scaling licences; licences for forest resource processing facilities, they also regulate the manuals to implement forest operations on Crown Land.

In terms of monitoring, the planning framework includes Independent forest audits to ensure that each management unit in the province is audited every 5 to 7 years. An independent auditor assesses the performance of both the sustainable forest licence holder and the MNRF in meeting their forest management responsibilities. The ministry and industry then respond to audit findings and recommendations by preparing action plans and status reports.

[Approved Forest Management Plans \(FMPs\) and Annual Work Schedules \(AWSs\)](#)

[Annual Work Schedule Technical Specifications](#)

An approved Forest Management Plan (FMP) is required before any forestry activities can take place on Crown land within a management unit. The FMP provides direction for the construction of access roads, harvesting, and renewal and maintenance activities on the management unit. An approved Annual Work Schedule identifies operations that are scheduled for implementation during the fiscal year on Crown land within a management unit. The forest managers receive a new value layer each year and the AWS is subsequently updated to reflect the changes due to these new values.

[Forest Information Manual](#)

The Forest Information Manual prescribes the mandatory requirements, standards, roles and responsibilities, timelines, and conditions for providing information to forest managers with respect to Crown lands. It includes information requirements that the MNRF is responsible for supplying to SFLs to support the preparation and implementation of forest management plans in accordance with the CFSA. Technical Specifications supplemental to the FIM outline detailed, technical conditions required under FIM.

[Forest Management Planning Manual March 2017](#)

The Forest Management Planning Manual provides direction on all aspects of forest management planning for plans scheduled for renewal after March 31, 2012 for Crown management units designated under the Crown Forest Sustainability Act (CFSA). It includes direction for the development of ten-year plans, annual work schedules, yearly reports and contingency plans.

[Forest Operations Silviculture Manual March 2017](#)

The Forest Operations and Silviculture Manual provides guidance and direction for operations authorized by approved forest management plans. It provides for the qualification of persons engaged in forest operations, as well as measures for assessing the performance of forest operations.

[Forest Compliance Handbook](#)

The Forest Compliance Strategy guides policy development and provides direction for forest compliance and specifies ways forest compliance is to be achieved on Crown land in Ontario.

[Forest Management: Conserving Biodiversity at the Stand and Site Scales](#)

MNRf recently reviewed and evaluated all Forest Management Guidelines and their associated prescriptions for the new *Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales* (the Stand and Site Guide or SSG). This Guide incorporated all relevant scientific information to ensure MNRf's prescriptions for values that could be identified as Areas of Concern (or High Conservation Values) are effective. This Guide also includes a detailed *Background and Rationale* document containing a literature review that establishes the basis for the prescriptions in the Guide. The Guide provides direction for forest management planning teams and practitioners to help them plan and implement specific forest operations. The primary objective of the guide is to ensure biodiversity at the stand and site scales is enhanced or maintained.

[Forest Management: Conserving Biodiversity at the Stand and Site Scales](#)

[Boreal Landscape Guide](#)

The landscape guide provides direction and guidance for boreal caribou planning. Forest management plans represent woodland caribou habitat in strategic forest management models using region specific habitat classifications. Planning teams compare their plan forest units to the Landscape Guide forest units and ensure that there is compatibility with the appropriate caribou habitat classifications. The arrangement and connectivity of caribou habitat is directed by the identification and placement of forest management actions intended to emulate disturbances that will encourage the maintenance and enhancement of caribou range occupancy including developing specific forest composition attributes that allow those landscape patches to fulfil their ecological role for caribou. In FMPs within or intersecting continuous caribou range (as defined by the Caribou Conservation Plan CCP), planning teams develop targets for caribou habitat indicators for milestones at years 10, 20 and 100.

In forest management units that are within or intersect the continuous distribution of caribou, planning teams describe how the direction provided by the Caribou Conservation Plan was addressed, including the development of a tract based Dynamic Caribou Habitat Schedule (DCHS), and how it is incorporated into targets for Landscape Guide caribou habitat indicators (standard).

Planning teams identify any large landscape patches (LLPs), using a strategic landscape map, that may be required to meet targets created for Landscape Guide pattern or habitat indicators (e.g. texture of the mature and old forest matrix, young forest patch size, woodland caribou habitat), and allow for the efficient implementation of other guides (e.g. Stand and Site Guide) (guideline).

Some of the Best Management Practices Available to planning teams include:

-Regenerate contiguous harvest tracts to a conifer dominated, shrub and herb-poor forest condition, of similar age class distribution (i.e., creating even-aged class structure).

-Minimize the amount of residual forest and prevent conversions to mixedwoods or hardwoods in all harvest blocks (e.g., to the extent possible, residual forest will be associated only with AOC prescriptions or CROs (conditions on regular operations CROs)

-Place emphasis on the management of caribou winter feeding habitat to occur in areas identified as having been used by caribou as winter feeding habitat, or specific areas with a high potential to develop into winter feeding habitat.

-Manage for calving and nursery habitat and include these habitats in caribou tracts and schedule them for protection or harvest consistent with habitat tract pattern and composition objectives.

-Only proceed with allocation of a habitat tract with calving sites and nursery areas provided they are in an unsuitable condition (e.g. over mature, with a dense understory of shrubs such as raspberry); or if there is a sufficient supply of calving and nursery habitat in suitable condition on the management unit.

-For known calving sites and nursery areas that are in a suitable condition, establish a 1 km area of concern (AOC) and do not conduct forest operations within the AOC from May 1 to August 15.

-Avoid road planning in traditional and potential high quality caribou habitat tracts, plan for the duration of forest access roads, when constructed in significant winter or snow-free season habitat tracts, which should be coincident with the time required to carry-out the management activities required to complete the silviculture necessary to reach the desired future forest condition.

-Adopt road use management strategies for primary, branch and operational roads consistent with caribou management objectives and approved actions identified in the CCP. Road decommissioning.

-Appropriate silvicultural intervention to produce suitable winter and refuge habitat.

-Plan for the duration of forest access roads, when constructed in significant winter or snow-free season habitat tracts, which should be coincident with the time required to carry-out the management activities required to complete the silviculture necessary to reach the desired future forest condition.

-Consider other industrial, recreational or commercial developments within the landscape that contribute or may contribute to cumulative impacts on caribou habitat.

[Forest Management Guides and Technical References](#)

Information for Crown forest managers developing plans for sustainable forests. The guides include silvicultural practices and methods on conserving biodiversity and protecting wildlife habitat, watersheds, cultural heritage and recreation.

[Woodland Caribou Guidelines](#)

For use in Northwestern Ontario. The Forest Management Guidelines for the Conservation of Woodland Caribou: A Landscape Approach provides direction for providing woodland caribou habitat during forest management operations.

[Woodland Caribou, Boreal population \(Rangifer tarandus caribou\): amended recovery strategy 2020](#)

Replaces the 2012 Strategy.

[Action Plan for the Woodland Caribou \(Rangifer tarandus caribou\), Boreal Population, in Canada](#)

Building on the Federal Recovery Strategy for Boreal Caribou (2012), the federal government will continue to do its part to recover boreal caribou. It has developed this Action Plan to describe the federal government's contribution to the recovery efforts. There are three key pillars in the Action Plan: science to support recovery; recovery and protection; and reporting on progress.

The Action Plan is partial at this time since it does not address all of the measures, as required in the Species at Risk Act (SARA). Fulfilment of SARA requirements would be accomplished as provinces/territories complete their range plans or similar documents, which can be adopted over time as subsequent Action Plans for the species.

[Range Plan Guidance for Woodland Caribou, Boreal Population 2016](#)

Range Plan Guidance is to assist jurisdictions in their preparation of range plans for the ranges within their province/territory.

NOTES:

**Critical Habitat is defined as: Under SARA, critical habitat is defined as "the habitat that is necessary for the survival or recovery of a listed wildlife species and that is identified as the species' critical habitat in the recovery strategy or in an action plan for the species". For boreal caribou, critical habitat identification describes the habitat that is necessary to maintain or recover self-sustaining local populations throughout their distribution. In some of the areas identified as critical habitat, the quality of habitat will need to be improved for recovery to be achieved. Specifically, the area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65% of the area as undisturbed habitat; and biophysical attributes required by boreal caribou to carry out life processes.*

[Amended Recovery Strategy for the Woodland Caribou \(Rangifer tarandus caribou\), Boreal population, in Canada 2019](#)

**Disturbance is defined as:*

Disturbance management threshold:

-at the scale of boreal caribou range, the habitat disturbance point below which conditions are such that the recovery goal will likely be met (i.e. acceptable level of risk), and above which the outcome is either highly uncertain or unacceptable.

Disturbed habitat: habitat showing: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer).

	<p><u>Amended Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal population, in Canada 2019</u></p> <p><i>Guidance from the CNRA:</i></p> <p>1 The term ‘management plan’ should be understood in its broadest sense to allow Organizations to take voluntary actions and provide evidence to auditors without necessarily having such content embedded in a legally approved Forest Management Plan for a forest management unit. In this context, management plans are defined as “The collection of documents, reports, records and maps that describe, justify, and regulate the activities carried out by any manager, staff or organization within or in relation to the sourcing area, including statements of objectives and policies.”</p> <p>2 Refer to the FSC glossary (FSC-STD-01-002) for a definition of ‘protection areas’.</p> <p>3 The requirements related to disturbance management thresholds should only apply where such threshold has been identified in the Federal Recovery Strategy (e.g., a disturbance management threshold of 65% of the area as undisturbed habitat is identified in the woodland caribou boreal population recovery strategy (Environment Canada, 2012)).</p> <p>Critical habitat is based on the foregoing, critical habitat for boreal caribou is as: The area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65% of the area as undisturbed habitat; and biophysical attributes required by boreal caribou to carry out life processes (see Appendix H)</p>	
3.2	<p>Specified Risk for the following IFLs: 100 & 121</p> <p>Control Measure: 1.Fiber is not procured within any of the Specified Risk IFLs within the Supply area of the Kenogami Forest, Pic Forest, Lake Nipigon Forest and the Ogoki Forest.</p> <p>Control Measure Statement: Fiber is not procured within specified risk IFLs in the sourcing area.</p> <p>Control Measure Verification: Reference Map. IFL Map Illustrating Specified Risk IFLs in the Supply are and Depletions from 2018-2019. Should any non-conformities be found in the future, an action plan to address the non-conformities shall be implemented.</p>	
3.3	Low Risk For Canada	
3.4	Low Risk For Ontario	
3.5	Low Risk For Canada	
3.6	Low Risk For Canada	
Controlled wood category 4.	Wood from forests being converted to plantations or non-forest use	
4.1	Low Risk For Reporting Zone	
Controlled wood category 5.	Wood from forests in which genetically modified trees are planted	
5.1	Low Risk For Canada	

4.b Risk assessment and mitigation for mixing in the supply chain

Participating site	Supply chain type	No. of tiers	Risk of mixing	Control measures	Findings from field verification if undertaken as a control measure
Nakina Lumber Inc.	Wood delivered and purchased directly from concession holder to mill log yard.	1.	No Risk of Mixing	n/a.	n/a.

5. Technical experts used in the development of control measures

N/A, technical experts were not required

6. Stakeholder consultation processes

N/A, stakeholder consultation not required

7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact [Chantal Alkins, Environmental Services Coordinator, GreenForest Management Inc., 1120 Premier Way, Thunder Bay, P7B 0A3 Phone: (807) 343-6581, Fax: (807) 343-6424 Email: Chantal@gfmiontario.ca] by mail, email, or phone. We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

FSC-CW-14.0 Complaints

Upon receipt of a complaint to a representative of NLI related to the supply of controlled wood fibre, irrespective of whether the supply is coming from an area considered as low risk or not, that representative will immediately (within 2 business days) complete PART I of the *Controlled Wood Fibre Complaint Form* (Appendix 6) and forward to the Environmental Services Coordinator.

The Environmental Services Coordinator will acknowledge the receipt of the complaint and inform the complainant of the complaint procedure as well as to provide them an initial response within a time period of two (2) weeks.

The Environmental Services Coordinator determines the validity of the complaint and completes PART II of the *Controlled Wood Fibre Complaint Form* within 2 weeks of the complaint. Complaints related to risk designations in the relevant FSC® risk assessment will be forwarded to the responsible body. Substantial complaints will be forwarded to the Certification Body and FSC Canada within two (2) weeks of receipt of the complaint, along with information on the steps taken to resolve the complaint as well as information on how a precautionary approach will be used. During the time that the complaint is pending a precautionary approach will be used towards sourcing of the relevant material.

If no further action is required, the Environmental Services Coordinator ensures a copy of the form (PART I and PART II) is filed and retained as per system requirements.

If additional action is required, the Environmental Services Coordinator assigns action as per PART II while ensuring that requirements are met as per section 7 Stakeholder input and complaints in the FSC-STD-40-005 V3-1 Requirements for Sourcing FSC® Controlled Wood. The assigned person ensures that PART III of the *Controlled Wood Fibre Complaint Form* (Field Verification) is completed within 2 months. If no further action is required, they ensure a copy of the form (PART I - III) is filed with the Environmental Services Coordinator. If additional actions are required, they complete PART III and forward the complete form (PARTS I – III) to the Environmental Services Coordinator.

If non-compliance with the FSC Controlled Wood requirements is confirmed, the Environmental Services Coordinator advises the Mill Manager, Controller, Wood Buyer and Supplier that the Supplier is to be excluded from the company's FSC Controlled Wood category. The Environmental Services Coordinator informs FSC Canada and the relevant FSC accredited Certification Body.

Where the company wishes to resume accepting deliveries from the Supplier the Environmental Services Coordinator, or a designate, is to work with the Supplier towards bringing the Supplier's operation back into compliance with the FSC Controlled Wood standard. Once the Supplier has proven to the Environmental Services Coordinator that the operation is in conformance with the FSC Controlled Wood standard the Environmental Services Coordinator will notify the Mill Manager, Controller and Wood Buyer and may resume receipt of deliveries from the Supplier.

If there are frequent non-compliances with the FSC Controlled Wood requirements in area(s) deemed to be low risk, the Environmental Services Coordinator conducts a review of the risk assessment and revises the system as required.

Responsibilities

Environmental Services Coordinator

- Ensures company representatives are aware of their roles in the case of complaints.
- Assigns staff as required to address complaints.
- Ensures efforts made to work with suppliers to ensure compliance following any complaints.
- Keeps records of all complaints

Document Control System

Name:	Details of Changes:	Date:
Chantal Alkins	Completion of Original Document	July 19, 2019
Chantal Alkins	Document Completed and DDS Implemented	December 20, 2019
Chantal Alkins	Reviewed and conducted revisions to the following: Under 3. Supply areas-Controlled wood category 1. I changed the Risk designation to 'Low Risk' (Page 2). Changed 2.3 Specified Risk Wood harvested in violation of traditional and human rights from low risk to specified risk in both documents. Added the language ", Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) (O. Reg. 242/08) provides for regulatory exemptions for forest operations in Crown forests has an extension until to June 30, 2021." Page 14 3.2 Changed the language from "No harvesting within these IFLs to 1. Fibre is not procured from within any of the Specified Risk IFLs within the Supply area of the Kenogami Forest, Pic Forest, Lake Nipigon Forest and the Ogoki Forest. Also updated the Control Measure Statement to say the same as above.	August 20-21, 2020
Chantal Alkins	ANNUAL REVIEW-Internal Audit. Edits to 3.1 Specified Risk for the following Eco Regions in the supply area: Midwestern Canadian Shield forest (50); Central Canadian Shield forests (43), and; Eastern Forest – Boreal Transition (5) : Moved the 2018-2019 Ontario Critical Habitat Reports for Woodland Caribou Boreal Population, to the beginning of the evidence listing, since that is where stakeholder engagement is listed. Added a link to Ontario's Woodland Caribou Conservation Plan. Added link to the following document for evidence Best Management Practices for Aggregate Activities and Woodland Caribou in Ontario. Re-worded the Control Measure Statement to emphasize Ontario's progress and stakeholder consultation on woodland caribou. Re-worded the Control Measure Verification.	October 18, 2020
Chantal Alkins	Annual Review and new control measures added to 3.1	October 19 & 26 th 2021

--	--	--

FSC Controlled Wood Due Diligence System Public Summary

1. General information

Organisation name:	Nakina Lumber Inc.
FSC certificate code:	NC-COC-007803 NC-CW-007803 (RA-COC-007803)FSC License Code FSC-C139143
Organisation's DDS contact person:	Chantal Alkins
DDS prepared/assisted by:	Chantal Alkins Environmental Services Coordinator
Date last reviewed/updated (by the organisation):	October 26, 2021

2. Suppliers

Participating site	Non-certified material type sourced	Exact number of suppliers	Supplier type(s)	Average no. of tiers in the supply chains	Approximate or exact number of sub-suppliers
Nakina Lumber Inc.	Roundwood logs (W1.1.1) -- full tree length and 16-foot cut length	5	Primary processor, Secondary processor,	1	1

3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
Kenogami Forest	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
Ogoki Forest	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
Lake Nipigon Forest	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
Pic Forest (FSC Certified)	1	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	2	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	3	National Risk Assessment for Canada FSC-NRA-CA V2-0	Specified risk
	4	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk
	5	National Risk Assessment for Canada FSC-NRA-CA V2-0	Low risk

4. Risk assessment and mitigation

4.a Risk mitigation for the origin of the material

Supply area: Kenogami Forest, Ogoki Forest, Lake Nipigon Forest & Pic Forest (FSC Certified)		
Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.1	Low Risk For Canada	
1.2	Low Risk For Canada	
1.3	Low Risk For Canada	
1.4	Low Risk For Canada	

1.5	Low Risk For Canada	
1.6	Low Risk For Canada	
1.7	Low Risk For Canada	
1.8	Low Risk For Canada	
1.9	Low Risk For Canada	
1.10	Low Risk For Canada	
1.11	Low Risk For Canada	
1.12	Low Risk For Canada	
1.13	Low Risk For Canada	
1.14	Low Risk For Canada	
1.15	Low Risk For Canada	
1.16	Low Risk For Canada	
1.17	Low Risk For Canada	
1.18	Low Risk For Canada	
1.19	Low Risk For Canada	
1.20	Low Risk For Canada	
1.21	Low Risk For Canada	
Controlled wood category 2. Wood harvested in violation of traditional and human rights		
2.1	Low Risk For Canada	
2.2	Low Risk For Canada	
2.3	Specified Risk Wood harvested in violation of traditional and human rights Control Measures: 1. Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan. Control Measure Statement: There is no active litigation, blockade, protest or other significant conflict of substantial magnitude in the supply area. Control Measure Verification: An assessment was conducted on November 19, 2021 to ensure that there are no significant conflicts in the supply area. The results of this assessment indicate no non-conformities whereas there are no significant conflicts within the supply area. In order to maintain this control measure, this assessment will be conducted on a bi-annually cycle in May and November. Should any non-conformities be found in the future, an action plan to address the non-conformities shall be implemented. The search is conducted utilizing the below references:	

Ontario Court of Justice: [Ontario Court of Justice](#) ; Environmental Registry of Ontario: [EBR](#) National News Outlets: [CBC News](#); Local News Outlets: [Thunder Bay News Watch](#); [Chronicle Journal](#) and [APTN News](#).

All of the Crown forests in the above listed supply areas are managed by or have forest resource licences held by First Nation-owned resource management companies. In addition, In Ontario, First Nation and Metis communities are provided the opportunity to participate on the planning teams for Forest Management Units (FMU)s. The Ministry of Natural Resources and Forestry (MNRF) provides a separate Consultation Program at the request of the First Nations as per “Aboriginal Involvement in Forest Management Planning”, FMPM - Part A, Section 4.0. Disputes arising during the development of the FMP are addressed through the FMP Issue Resolution Procedure, FMPM 3.4. Prescriptions are developed to address concerns, in the FMP as Operational Prescriptions for Areas of Concern. Forest Management Guides have been developed for the processes, such as the [Forest Management Guide for Cultural Heritage Values](#).

Kenogami Forest (FSC Certified)

This forest management unit is currently being managed under a Forest Resource Licence and Forestry Agreement held by Ne-Daa-Kii-Me-Naan Incorporated. Ne-Daa-Kii-Me-Naan Inc. (Nedaak) is a First Nation owned company established in 2012 to manage the Kenogami Forest and to provide economic development opportunities for surrounding First Nations and local communities. Board members of Nedaak are Constance Lake First Nation; Long Lake #58 First Nation; Aroland First Nation; Ginoogaming First Nation; Red Rock Indian Band; Pays Plat First Nation, and; Animbiigoo Zaagi igan Anishinaabek. See [Nedaak Website](#)

Pic Forest (FSC Certified)

The Pic Forest is an amalgamation of the Big Pic and Pic River Forest Management Units. In April 2013, the Nawiinginokiima Forest Management Corporation was granted a Forest Resource Licence and became the first Local Forest Management Corporation to be established pursuant to the Ontario Forest Tenure Modernization Act, 2011. The Nawiinginokiima Forest Management Corporation is a Crown Corporation established to operate within a defined management area that includes the communities of the Ojibways of the Pic River First Nation, Pic Mobert First Nation, Hornepayne Aboriginal community, Marathon, Hornepayne, Manitouwadge and White River. The Nawiinginokiima Forest Management Corporation will continue to be the Sustainable Forest Licence holder when the units are amalgamated in 2019. See [Nawiinginokiima Forest Management Corporation Website](#)

Lake Nipigon Forest

Lake Nipigon Forest Management Inc. (LNFMI) has the only First Nation-run Sustainable Forestry License (SFL) in the province, and they manage almost one million hectares of forestlands in the Lake Nipigon forest region. LNFMI is owned by four First Nation communities: Animbiigoo Zaagi’igan Anishinaabek, Bingwi Neyaashi Anishinaabek, Biinjitiwaabik Zaaging Anishinaabek and the Red Rock Indian Band. LNFMI is responsible for planning, reporting and implementing all forestry operations on the SFL. See [LNFMI](#)

	<p>Ogoki Forest Agoke Development Limited Partnership (ADLP) manages the Ogoki Forest. ADLP is a forestry company owned by the First Nations of Aroland, Eabametoong and Marten Falls. ADC delivers services including forest management, harvesting, road construction, road maintenance and training. ADLP has a Forest Resource Licence and a Forestry Agreement on the Ogoki. ADLP allows for community members to have input and opportunities in the forestry sector. In 2018, ADC received the NADF Business Partnership of the Year award for its work in the Ogoki Forest.</p>	
Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities		
3.1	<p>Specified Risk for the following Eco Regions in the supply area: Midwestern Canadian Shield forest (50); Central Canadian Shield forests (43), and; Eastern Forest – Boreal Transition (5)</p> <p>Control Measure for the Lake Nipigon Forest Portion of the Wood Supply: 9. The Organization implements a strategy to reduce sourcing over the next 5 years from areas of woodland caribou critical habitat* where management plans do not meet the Federal Recovery Strategy. Guidance: Management plans that ‘meet the Federal Recovery Strategy’ would apply in areas where Control Measure #3, 7 or 10 are met. And. The Organization acts within their sphere of influence to publicly advocate to the relevant decision makers at the government level and other relevant forest industry partners about the need to finalize and implement legal requirements that meet the Federal Recovery Strategy.</p> <p>Control Measure Statement: Strategy to reduce sourcing over 5 years: NLI has allowed for 40% of its wood basket SPF to be procured from the Lake Nipigon Forest. Moving forward, LLI will reduce its supply by 20% over the next five years.</p> <p>Control Measure Verification: Evidence for #9-Lake Nipigon Forest <u>No fibre has been sourced from the Lake Nipigon Forest in 2021.</u> A strategy is in place as per statement above.</p> <p>Control Measure for the Ogoki Portion of the Wood Supply: 8. Evidence demonstrates that forests in the sourcing area have a management plan that contributes to the recovery of woodland caribou critical habitat*, as identified in the Federal Recovery Strategy. The management plan identifies and implements:</p> <p>a) Best Management Practices (BMPs) that reduce disturbance to and restore critical habitat* including, but not limited to:</p> <ul style="list-style-type: none"> • access management (e.g. road decommissioning, integrated access plans, restoration of linear features); OR • aggregate harvesting (i.e. harvest scheduling to minimize disturbance footprint). <p>OR</p>	

b) Harvest deferrals, set asides, and/or protection areas² within areas of critical habitat*, where forest operations are not permitted.

Rationale is provided as to how such actions will contribute to reducing the level of disturbance over time in critical habitat*, in support of meeting the threshold requirements in the Federal Recovery Strategy.

Control Measure Statement:

The Crown Forest Sustainability Act (CFSA) and the Forest Management Planning Manual (FMPM) provide protection processes, while Forest Management Plans (FMP) identify specific values and specific operational prescriptions to protect values (caribou) in Ontario Forests. The 2014 guidelines under the CFSA require forest managers to follow a Dynamic Caribou Habitat Schedule (DCHS) to support management decisions to ensure a sustainable supply of caribou habitat over space and time. Ontario has a robust sustainable forest management framework that includes regulatory tools and legal instruments that, in their application, contribute to the sustainability of woodland caribou.

Control Measure #8, is implemented in the Forest Management Planning processes as documented in the FMPs for the sourcing area. These plans comply with Ontario's Forest Management Planning Manual (FMPM). Forest Management Plans in Ontario are developed by highly skilled teams of Registered Professional Foresters (RPFs), biologists, silviculture foresters, GIS experts and local stakeholders.

The planning team for the Ogoki Forest includes individuals in the following rolls: Project Manager and Chair Regional Planning Forester; Plan Author; General Manager; Management Forester; Management Biologist; Resource Liaison Specialist; Regional Planning Biologist; President and Forest Resource Licence Holder Representative (Indigenous Owned Organization); Director, Forest Resource Licence Holder Representative (Indigenous Owned Organization); Nakina Lumber Inc.; Columbia Forest Products; Geraldton Area Natural Resources Advisory Committee; LCC Representative Geraldton Area Natural Resources Advisory Committee; LCC Representative; Marten Falls First Nation First Nation Community Representative; Eabametoong First Nation-First Nation Community Representative; Animiigoo Zaagi'igan Anishinaabek-First Nation Community Representative; Aroland First Nation First Nation Community Representative; GreenForest Management Inc. Operations/Planning Forester; Ginoogaming First Nation-First Nation Community Representative, and; Long Lake #58 First Nation-First Nation Community Representative.

These skilled teams use a number of tools in the planning processes such as, enhanced eFRI, Ontario's Landscape Tool (OLT); Caribou Habitat Landscape Guide Indicators; Inventories and Information for Species at Risk, Endangered and Threatened Species and Special Concern Species as well as values information including First Nation values. Planning teams produce value maps for the protection of values in Area of Concern's (AOC)s.

Planning is centered around balancing objectives, one of them being Forest Diversity and Provision of Forest Cover for habitat for forest dwelling woodland caribou within local population ranges. The planning team aims to create/maintain a suitable supply and arrangement of large forest patches of forest area in within the caribou distribution range, through the retention and harvest of

Dynamic Caribou Habitat Schedule (DCHS) blocks through time. The planning team follow guidelines that emphasize the maintenance of woodland caribou habitat through the implementation of the DCHS. They also utilize best information available, Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR) direction and guides, new information brought forward by stakeholders and local knowledge.

First Nation representatives on the planning team also brings information back to the communities to gain input in the development of the FMP, First Nation representatives coordinate the gathering of data from the information centres within the communities.

The forests in the sourcing area all have approved FMPs. The FMPs identify and implement protection processes, operational prescriptions and best management practices (BMPs) that aim to protect values. The plans contain detail on habitat and disturbance assessments, as well identifying other species and landscape features that contribute to caribou conservation. The FMP process includes the effective engagement of stakeholders and Indigenous Peoples through several different meaningful consultation processes. These and the other planning tools available to resource managers are outlined below.

Ontario has taken steps to incorporate and contribute to new science and information used to manage caribou habitat. In addition, the Province has made an effort to consult with stakeholders and Indigenous Peoples on caribou conservation that is consistent with the Range Plan Guidance for Woodland Caribou, Boreal Population (ECCC 2016), and these initiatives are evidenced by Ontario Critical Habitat Reports (2018 & 2019) outlined below.

Control Measure Verification:

This Control Measure is verified by an assessment of the legal forest management framework and presenting the evidence and rationale regarding the Forest Management Planning Processes in the sourcing areas. Ontario has a robust sustainable forest management framework. There are numerous planning tools available for forest management planning teams and practitioners in the planning processes as outlined below. The supply area forests are **First Nation managed forests** that have approved forest management plans that are produced under the guidance of the Ontario's Woodland Caribou Conservation Plan and Forest Management Guide for Boreal Landscapes. These plans, BMPs and guidance documents direct forest management planning teams to include access management and aggregate harvest/anthropogenic disturbance.

Harvest deferrals are identified within the Dynamic Caribou Habitat Schedule (DCHS), and within the deferral areas forestry operations are not permitted Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR) have recently identified geographic areas that are frequently used for calving and nursery areas and have applied a protection prescription to ensure minimum disturbance during spring and early summer. The DCHS pattern aggregates harvest and emulates natural disturbance patterns. Reforestation and restoration are evidenced in all approved FMPs in the continuous caribou range in Ontario.

Ontario is working towards incorporating and contributing to new science and information used to manage caribou habitat. In addition the Province has made an efforts to consult with stakeholders and Indigenous Peoples on caribou conservation.

In order to maintain this control measure, an assessment will be conducted annually during the internal audit processes to determine any updates to the evidence listed below. Should any non-conformities be found in the future, an action plan to address the non-conformities shall be implemented. The assessment will be conducted utilizing the below references:

Evidence for verification of the Control Measure # 8 are contained in the following appendices of the Company's Due Diligence System:

Appendix A

References to Sections of the Ogoki Forest Forest Management Plan

Appendix B

Ogoki Forest FMP

Appendix C

IFL Assessment the Ogoki Forest

Other Regulatory Evidence and The Sustainable Forest Management Framework as verification of the Control Measure # 8 is listed below:

[Bill 229](#)

Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020 Schedule 8 Crown Forest Sustainability Act, 1994. The Schedule repeals provisions of the Crown Forest Sustainability Act, 1994 that address when forest management plans are deemed to include certain parts of agreements or regulations under the Endangered Species Act, 2007 and related matters.

A new section is added to the Act providing that a person is exempt from certain provisions of the Endangered Species Act, 2007 while conducting forest operations in a Crown forest, in accordance with an approved forest management plan, and on behalf of the Crown or under the authority of a forest resource licence. Currently, similar provisions are included in a regulation made under the Endangered Species Act, 2007.

[Crown Forest Sustainability Act, 1994, S.O. 1994, c. 25](#)

[CFSA O. Reg. 167/95: GENERAL](#)

[O. Reg. 160/04: INDEPENDENT FOREST AUDITS](#)

The CFSA provides for the sustainability of Crown forests where it establishes requirements around forest management planning and forest resource licencing. More specifically, the Act ensures that forest operations are undertaken in accordance with approved manuals. Content of the manuals is regulated to implement forest operations on Crown Land (Forest Management Planning Manual, Forest Information Manual, Forest Operations and Silviculture Manual, Scaling Manual) as well as transitional provisions for forest management plans, annual work schedules, and licences.

While the CFSA regulates crown charges; terms and conditions of forest resource licences and overlapping licenses; amendments, cancellations and transfers of forest resource licenses; scaling licences; licences for forest resource processing facilities, they also regulate the manuals to implement forest operations on Crown Land.

In terms of monitoring, the planning framework includes Independent forest audits to ensure that each management unit in the province is audited every 5 to 7 years. An independent auditor assesses the performance of both the sustainable forest licence holder and the MNRF in meeting their forest management responsibilities. The ministry and industry then respond to audit findings and recommendations by preparing action plans and status reports.

The scientific basis for managing caribou habitat continues to evolve in Ontario. While Ontario does not yet have a Range Management Plan, the Province implements a range management approach through the Range Management Policy in Support of Woodland Caribou Conservation and Recovery. The Range Management Policy aims to manage cumulative disturbance at a level that supports self-sustaining caribou populations and manages the amount and arrangement of habitat consistent with levels that have been estimated to occur in natural landscapes. Caribou management is applied through Ontario's Woodland Caribou Conservation Plan and subsequent Best Management Practices for Aggregate Activities and Woodland Caribou in Ontario. Ontario has taken steps to incorporate and contribute to new science and information used to manage caribou habitat. In addition the Province has made an effort to consult with stakeholders and Indigenous Peoples on caribou conservation that is consistent with the Range Plan Guidance for Woodland Caribou, Boreal Population (ECCC 2016), and these initiatives are evidenced by Ontario Critical Habitat Reports (2018 & 2019) outlined below.

[Ontario's Woodland Caribou Conservation Plan](#)

This plan has been developed to meet the requirements under subsection 11(8) of the ESA, 2007, to identify and prioritize the actions the government intends to take in response to the final Recovery Strategy for Woodland Caribou (forest-dwelling, boreal population) in Ontario, published August 21, 2008. To develop the Caribou Conservation Plan, the MNRF considered the advice provided in the Caribou Recovery Strategy, the recommendations of the Woodland Caribou Science Review Panel and input received from the public, stakeholders and Aboriginal Peoples through several stakeholder sessions and through the Environmental Registry.

[Range Management Policy in Support of Woodland Caribou Conservation and Recovery](#)

The Range Management Policy provides a transparent and evidence-based approach to planning and decision-making in caribou habitat that maintains or improves the condition of caribou ranges in Ontario. It directs the implementation of the Range Management Approach and enables industry to proceed with development in a way that complies with the Endangered Species Act (ESA).

[Best Management Practices for Aggregate Activities and Woodland Caribou in Ontario](#)

[Report of the Ontario Woodland Caribou Science Review Panel: The Path Forward](#)

The purpose of this panel is to assist the public, stakeholders and Aboriginal Peoples in providing input into the development of the Caribou Conservation Plan. The MNRF developed a discussion paper titled, Keeping Caribou in Ontario. The public was invited to complete and submit their responses to a questionnaire between August 21 and September 26, 2008. Responses were considered when developing the draft Caribou Conservation Plan and the proposed habitat regulation for forest-dwelling Woodland Caribou.

The Crown Forest Sustainability Act (CFSA) and the Forest Management Planning Manual (FMPM) provide protection processes, while Forest Management Plans (FMP) identify specific values and specific operational prescriptions to protect values (caribou) in Ontario Forests. The 2014 guidelines under the CFSA require forest managers to follow a *Dynamic Caribou Habitat Schedule* to support management decisions to ensure a sustainable supply of caribou habitat over space and time. Ontario has a robust sustainable forest management framework that includes regulatory tools and legal instruments that, in their application, contribute to the sustainability of woodland caribou.

The forests in the sourcing area all have Approved Forest Management Plans (FMP). The FMPs identify and implement protection processes, operational prescriptions and best management practices (BMPs) that aim to protect values. The plans contain detail on population, habitat and disturbance assessments, as well identifying other species and landscape features that contribute to caribou conservation. The FMP process includes the effective engagement of stakeholders and Indigenous Peoples through several different meaningful consultation processes. These and the other planning tools available to resource managers are outlined below.

In addition to all of the above, Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) (O. Reg. 242/08) provides for regulatory exemptions for forest operations in Crown forests has an extension until to June 30, 2021.

[2019 Ontario Critical Habitat Reports for Woodland Caribou Boreal Population](#)

-Continued development of a management approach for the Lake Superior Coast range (i.e., the Coastal range) and Discontinuous Distribution. An Indigenous and stakeholder workshop was held in March 2019 to provide background information about boreal

caribou in the Lake Superior Coast range and Discontinuous Distribution and to discuss and obtain feedback to inform the development of a management approach for this range.

-Under the Ontario Forest Management Guide for Boreal Landscapes, continued incorporation of requirements for the management of boreal caribou habitat through space and time, including the development of a Dynamic Caribou Habitat Schedule, into forest management plans that intersect with boreal caribou ranges. Individual management plans are at various stages of completion depending on plan renewal schedules.

-Ongoing monitoring of the translocated caribou in the Lake Superior Coast range, and monitoring collars were deployed in the Ozhiski range (part of the Far North range) in March 2019.

-Collaboration and increased knowledge for boreal caribou conservation, through continuation of Ontario-funded stewardship and research projects. For example, the Wildlife Conservation Society of Canada is examining the relationship between disturbance and site fidelity, at multiple scales, by boreal caribou in Ontario.

-Ongoing boreal caribou habitat mapping work to delineate Category 1 high use areas (nursery and winter use areas).

-Continued implementation of the Range Management Policy in Support of Woodland Caribou Conservation and Recovery, including the detailed assessment of potential adverse effects on caribou and their habitat and the identification of avoidance, mitigation, and conditions for authorization.

Additional steps taken in Ontario

Initiatives to support recovery and protection outcomes for boreal caribou and its critical habitat in the province are also being led by Indigenous governments, organizations and communities, and stakeholders. In 2018 to 2019, ECCC funded four Indigenous-led projects, two stakeholder-led projects, and one multi-partner table. NRCan also funded one Indigenous-led project in Ontario. These projects focused on collection of Indigenous Knowledge and scientific research, conservation planning, creation of protected areas, engagement, and population and habitat monitoring.

For example, Matawa First Nations Management tribal council is conducting a two-year project focused on knowledge gathering, research, and capacity building on boreal caribou within the traditional territory of the Matawa Member First Nations. Beginning in December 2018, delegates from nine member communities gathered to discuss current boreal caribou research and data, collection of Indigenous Knowledge and "caribou stories," future research interests, and environmental monitoring. This information will contribute to a video, Story Map and hardcopy publications that will become valuable communication tools for community impact assessment work and informed decision-making. Community outreach sessions, which targeted youth and

interested community members, occurred in two First Nation communities, and included lessons on caribou ecology, research, and species at risk status.

Boreal caribou recovery in Ontario benefits from the work of multi-partner groups that are keen to build partnerships to further boreal caribou conservation and recovery. Collaborative projects, including in the Kesagami range, supported by ECCC, and in the Brightsand and Churchill ranges, aim to contribute to landscape-level planning, identify protected area opportunities, and incorporate multi-species considerations.

Canada and Ontario have made advancements and are continuing to engage on the negotiation of a draft conservation agreement under Section 11 of SARA for boreal caribou in the province. The agreement would codify measures of relevance to the protection and recovery of the species and its critical habitat.

2018 Ontario Critical Habitat Reports for Woodland Caribou Boreal Population

-in 2013, Ontario published the General Habitat Description for the Forest-dwelling Woodland Caribou (*Rangifer tarandus caribou*), a technical document that provides greater clarity in relation to the habitat protected under the Endangered Species Act, 2007 (ESA)

-in 2014, the Government of Ontario released its Range Management Policy in Support of Woodland Caribou Conservation and Recovery, which describes how the Government of Ontario will make coordinated planning decisions to maintain or improve boreal caribou range conditions. The policy applies to all ranges except the Coastal range (ON6). The policy describes a Range Management Approach, the implementation of which Ontario considers to be its approach to province-wide range planning

-with respect to the Coastal range (ON6), where Ontario's Range Management Policy in Support of Woodland Caribou Conservation and Recovery does not apply, Ontario has been working since 2016 to develop a policy approach for managing the range that is consistent with the direction outlined in Ontario's Woodland Caribou Conservation Plan

-the 2014 Forest Management Guide for Boreal Landscapes, under the authority of the CFSA, set caribou-specific habitat objectives that direct forest managers to manage the quality, quantity and arrangement of caribou habitat, and which included a mapped "Dynamic Caribou Habitat Schedule" to support management decisions to ensure a sustainable supply of caribou habitat over space and time. Any new forest management plans scheduled for implementation on or after April 1, 2017, are required to follow the guidance outlined in the 2014 Forest Management Guide for Boreal Landscapes

-with respect to forest management planning in Crown forests, Ontario has been evaluating and conducting targeted consultations on options to better integrate the requirements of the ESA and CFSA, following expiry of the related ESA regulatory exemption

-in the Far North Planning Area, Ontario is working with First Nations on the development of community based land use plans under the Far North Act, which include the identification of dedicated protected areas, working towards the objective of 225,000 km² of interconnected protected areas in the Far North of Ontario. These dedicated protected areas are expected to include areas of valuable caribou habitat. Five plans have been approved to date, and eight more are under development

-the province of Ontario has made significant investments into science and monitoring work, including work under the Collaborative Provincial Caribou Research Program, which could lead to further advancements in protection and recovery of boreal caribou in Ontario

Prior to, during, and since the 5-years mentioned above, Ontario has made significant investments (over \$11 million) in taking many important and positive steps for caribou recovery guided by its Woodland Caribou Conservation Plan, 2009.

In March 2018, Ontario posted a discussion paper, Seeking Advice on the Future of Caribou in the Lake Superior Coast Range to obtain public input to inform the development of a management approach for this range and the area of “Discontinuous Distribution” between this range and those further to the North.

The Sustainable Forest Management Framework

[Crown Forest Sustainability Act, 1994, S.O. 1994, c. 25](#)

[CFSA O. Reg. 167/95: GENERAL](#)

[O. Reg. 160/04: INDEPENDENT FOREST AUDITS](#)

The CFSA provides for the sustainability of Crown forests where it establishes requirements around forest management planning and forest resource licencing. More specifically, the Act ensures that forest operations are undertaken in accordance with approved manuals. Content of the manuals is regulated to implement forest operations on Crown Land (Forest Management Planning Manual, Forest Information Manual, Forest Operations and Silviculture Manual, Scaling Manual) as well as transitional provisions for forest management plans, annual work schedules, and licences.

While the CFSA regulates Crown charges; terms and conditions of forest resource licences and overlapping licenses; amendments, cancellations and transfers of forest resource licenses; scaling licences; licences for forest resource processing facilities, they also regulate the manuals to implement forest operations on Crown Land.

In terms of monitoring, the planning framework includes Independent forest audits to ensure that each management unit in the province is audited every 5 to 7 years. An independent auditor assesses the performance of both the sustainable forest licence holder and the MNRF in meeting their forest management responsibilities. The ministry and industry then respond to audit findings and recommendations by preparing action plans and status reports.

[Approved Forest Management Plans \(FMPs\) and Annual Work Schedules \(AWSs\)](#)

[Annual Work Schedule Technical Specifications](#)

An approved Forest Management Plan (FMP) is required before any forestry activities can take place on Crown land within a management unit. The FMP provides direction for the construction of access roads, harvesting, and renewal and maintenance activities on the management unit. An approved Annual Work Schedule identifies operations that are scheduled for implementation during the fiscal year on Crown land within a management unit. The forest managers receive a new value layer each year and the AWS is subsequently updated to reflect the changes due to these new values.

[Forest Information Manual](#)

The Forest Information Manual prescribes the mandatory requirements, standards, roles and responsibilities, timelines, and conditions for providing information to forest managers with respect to Crown lands. It includes information requirements that the MNRF is responsible for supplying to SFLs to support the preparation and implementation of forest management plans in accordance with the CFSA. Technical Specifications supplemental to the FIM outline detailed, technical conditions required under FIM.

[Forest Management Planning Manual March 2017](#)

The Forest Management Planning Manual provides direction on all aspects of forest management planning for plans scheduled for renewal after March 31, 2012 for Crown management units designated under the Crown Forest Sustainability Act (CFSA). It includes direction for the development of ten-year plans, annual work schedules, yearly reports and contingency plans.

[Forest Operations Silviculture Manual March 2017](#)

The Forest Operations and Silviculture Manual provides guidance and direction for operations authorized by approved forest management plans. It provides for the qualification of persons engaged in forest operations, as well as measures for assessing the performance of forest operations.

[Forest Compliance Handbook](#)

The Forest Compliance Strategy guides policy development and provides direction for forest compliance and specifies ways forest compliance is to be achieved on Crown land in Ontario.

[Forest Management: Conserving Biodiversity at the Stand and Site Scales](#)

MNRf recently reviewed and evaluated all Forest Management Guidelines and their associated prescriptions for the new *Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales* (the Stand and Site Guide or SSG). This Guide incorporated all relevant scientific information to ensure MNRf's prescriptions for values that could be identified as Areas of Concern (or High Conservation Values) are effective. This Guide also includes a detailed *Background and Rationale* document containing a literature review that establishes the basis for the prescriptions in the Guide. The Guide provides direction for forest management planning teams and practitioners to help them plan and implement specific forest operations. The primary objective of the guide is to ensure biodiversity at the stand and site scales is enhanced or maintained.

[Forest Management: Conserving Biodiversity at the Stand and Site Scales](#)

[Boreal Landscape Guide](#)

The landscape guide provides direction and guidance for boreal caribou planning. Forest management plans represent woodland caribou habitat in strategic forest management models using region specific habitat classifications. Planning teams compare their plan forest units to the Landscape Guide forest units and ensure that there is compatibility with the appropriate caribou habitat classifications. The arrangement and connectivity of caribou habitat is directed by the identification and placement of forest management actions intended to emulate disturbances that will encourage the maintenance and enhancement of caribou range occupancy including developing specific forest composition attributes that allow those landscape patches to fulfil their ecological role for caribou. In FMPs within or intersecting continuous caribou range (as defined by the Caribou Conservation Plan CCP), planning teams develop targets for caribou habitat indicators for milestones at years 10, 20 and 100.

In forest management units that are within or intersect the continuous distribution of caribou, planning teams describe how the direction provided by the Caribou Conservation Plan was addressed, including the development of a tract based Dynamic Caribou Habitat Schedule (DCHS), and how it is incorporated into targets for Landscape Guide caribou habitat indicators (standard).

Planning teams identify any large landscape patches (LLPs), using a strategic landscape map, that may be required to meet targets created for Landscape Guide pattern or habitat indicators (e.g. texture of the mature and old forest matrix, young forest patch size, woodland caribou habitat), and allow for the efficient implementation of other guides (e.g. Stand and Site Guide) (guideline).

Some of the Best Management Practices Available to planning teams include:

-Regenerate contiguous harvest tracts to a conifer dominated, shrub and herb-poor forest condition, of similar age class distribution (i.e., creating even-aged class structure).

-Minimize the amount of residual forest and prevent conversions to mixedwoods or hardwoods in all harvest blocks (e.g., to the extent possible, residual forest will be associated only with AOC prescriptions or CROs (conditions on regular operations CROs)

-Place emphasis on the management of caribou winter feeding habitat to occur in areas identified as having been used by caribou as winter feeding habitat, or specific areas with a high potential to develop into winter feeding habitat.

-Manage for calving and nursery habitat and include these habitats in caribou tracts and schedule them for protection or harvest consistent with habitat tract pattern and composition objectives.

-Only proceed with allocation of a habitat tract with calving sites and nursery areas provided they are in an unsuitable condition (e.g. over mature, with a dense understory of shrubs such as raspberry); or if there is a sufficient supply of calving and nursery habitat in suitable condition on the management unit.

-For known calving sites and nursery areas that are in a suitable condition, establish a 1 km area of concern (AOC) and do not conduct forest operations within the AOC from May 1 to August 15.

-Avoid road planning in traditional and potential high quality caribou habitat tracts, plan for the duration of forest access roads, when constructed in significant winter or snow-free season habitat tracts, which should be coincident with the time required to carry-out the management activities required to complete the silviculture necessary to reach the desired future forest condition.

-Adopt road use management strategies for primary, branch and operational roads consistent with caribou management objectives and approved actions identified in the CCP. Road decommissioning.

-Appropriate silvicultural intervention to produce suitable winter and refuge habitat.

-Plan for the duration of forest access roads, when constructed in significant winter or snow-free season habitat tracts, which should be coincident with the time required to carry-out the management activities required to complete the silviculture necessary to reach the desired future forest condition.

-Consider other industrial, recreational or commercial developments within the landscape that contribute or may contribute to cumulative impacts on caribou habitat.

[Forest Management Guides and Technical References](#)

Information for Crown forest managers developing plans for sustainable forests. The guides include silvicultural practices and methods on conserving biodiversity and protecting wildlife habitat, watersheds, cultural heritage and recreation.

[Woodland Caribou Guidelines](#)

For use in Northwestern Ontario. The Forest Management Guidelines for the Conservation of Woodland Caribou: A Landscape Approach provides direction for providing woodland caribou habitat during forest management operations.

[Woodland Caribou, Boreal population \(Rangifer tarandus caribou\): amended recovery strategy 2020](#)

Replaces the 2012 Strategy.

[Action Plan for the Woodland Caribou \(Rangifer tarandus caribou\), Boreal Population, in Canada](#)

Building on the Federal Recovery Strategy for Boreal Caribou (2012), the federal government will continue to do its part to recover boreal caribou. It has developed this Action Plan to describe the federal government's contribution to the recovery efforts. There are three key pillars in the Action Plan: science to support recovery; recovery and protection; and reporting on progress.

The Action Plan is partial at this time since it does not address all of the measures, as required in the Species at Risk Act (SARA). Fulfilment of SARA requirements would be accomplished as provinces/territories complete their range plans or similar documents, which can be adopted over time as subsequent Action Plans for the species.

[Range Plan Guidance for Woodland Caribou, Boreal Population 2016](#)

Range Plan Guidance is to assist jurisdictions in their preparation of range plans for the ranges within their province/territory.

NOTES:

**Critical Habitat is defined as: Under SARA, critical habitat is defined as "the habitat that is necessary for the survival or recovery of a listed wildlife species and that is identified as the species' critical habitat in the recovery strategy or in an action plan for the species". For boreal caribou, critical habitat identification describes the habitat that is necessary to maintain or recover self-sustaining local populations throughout their distribution. In some of the areas identified as critical habitat, the quality of habitat will need to be improved for recovery to be achieved. Specifically, the area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65% of the area as undisturbed habitat; and biophysical attributes required by boreal caribou to carry out life processes.*

[Amended Recovery Strategy for the Woodland Caribou \(Rangifer tarandus caribou\), Boreal population, in Canada 2019](#)

**Disturbance is defined as:*

Disturbance management threshold:

-at the scale of boreal caribou range, the habitat disturbance point below which conditions are such that the recovery goal will likely be met (i.e. acceptable level of risk), and above which the outcome is either highly uncertain or unacceptable.

Disturbed habitat: habitat showing: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer).

	<p><u>Amended Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal population, in Canada 2019</u></p> <p><i>Guidance from the CNRA:</i></p> <p>1 The term ‘management plan’ should be understood in its broadest sense to allow Organizations to take voluntary actions and provide evidence to auditors without necessarily having such content embedded in a legally approved Forest Management Plan for a forest management unit. In this context, management plans are defined as “The collection of documents, reports, records and maps that describe, justify, and regulate the activities carried out by any manager, staff or organization within or in relation to the sourcing area, including statements of objectives and policies.”</p> <p>2 Refer to the FSC glossary (FSC-STD-01-002) for a definition of ‘protection areas’.</p> <p>3 The requirements related to disturbance management thresholds should only apply where such threshold has been identified in the Federal Recovery Strategy (e.g., a disturbance management threshold of 65% of the area as undisturbed habitat is identified in the woodland caribou boreal population recovery strategy (Environment Canada, 2012)).</p> <p>Critical habitat is based on the foregoing, critical habitat for boreal caribou is as: The area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65% of the area as undisturbed habitat; and biophysical attributes required by boreal caribou to carry out life processes (see Appendix H)</p>	
3.2	<p>Specified Risk for the following IFLs: 100 & 121</p> <p>Control Measure: 1.Fiber is not procured within any of the Specified Risk IFLs within the Supply area of the Kenogami Forest, Pic Forest, Lake Nipigon Forest and the Ogoki Forest.</p> <p>Control Measure Statement: Fiber is not procured within specified risk IFLs in the sourcing area.</p> <p>Control Measure Verification: Reference Map. IFL Map Illustrating Specified Risk IFLs in the Supply are and Depletions from 2018-2019. Should any non-conformities be found in the future, an action plan to address the non-conformities shall be implemented.</p>	
3.3	Low Risk For Canada	
3.4	Low Risk For Ontario	
3.5	Low Risk For Canada	
3.6	Low Risk For Canada	
Controlled wood category 4.	Wood from forests being converted to plantations or non-forest use	
4.1	Low Risk For Reporting Zone	
Controlled wood category 5.	Wood from forests in which genetically modified trees are planted	
5.1	Low Risk For Canada	

4.b Risk assessment and mitigation for mixing in the supply chain

Participating site	Supply chain type	No. of tiers	Risk of mixing	Control measures	Findings from field verification if undertaken as a control measure
Nakina Lumber Inc.	Wood delivered and purchased directly from concession holder to mill log yard.	1.	No Risk of Mixing	n/a.	n/a.

5. Technical experts used in the development of control measures

N/A, technical experts were not required

6. Stakeholder consultation processes

N/A, stakeholder consultation not required

7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact [Chantal Alkins, Environmental Services Coordinator, GreenForest Management Inc., 1120 Premier Way, Thunder Bay, P7B 0A3 Phone: (807) 343-6581, Fax: (807) 343-6424 Email: Chantal@gfmiontario.ca] by mail, email, or phone. We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

FSC-CW-14.0 Complaints

Upon receipt of a complaint to a representative of NLI related to the supply of controlled wood fibre, irrespective of whether the supply is coming from an area considered as low risk or not, that representative will immediately (within 2 business days) complete PART I of the *Controlled Wood Fibre Complaint Form* (Appendix 6) and forward to the Environmental Services Coordinator.

The Environmental Services Coordinator will acknowledge the receipt of the complaint and inform the complainant of the complaint procedure as well as to provide them an initial response within a time period of two (2) weeks.

The Environmental Services Coordinator determines the validity of the complaint and completes PART II of the *Controlled Wood Fibre Complaint Form* within 2 weeks of the complaint. Complaints related to risk designations in the relevant FSC® risk assessment will be forwarded to the responsible body. Substantial complaints will be forwarded to the Certification Body and FSC Canada within two (2) weeks of receipt of the complaint, along with information on the steps taken to resolve the complaint as well as information on how a precautionary approach will be used. During the time that the complaint is pending a precautionary approach will be used towards sourcing of the relevant material.

If no further action is required, the Environmental Services Coordinator ensures a copy of the form (PART I and PART II) is filed and retained as per system requirements.

If additional action is required, the Environmental Services Coordinator assigns action as per PART II while ensuring that requirements are met as per section 7 Stakeholder input and complaints in the FSC-STD-40-005 V3-1 Requirements for Sourcing FSC® Controlled Wood. The assigned person ensures that PART III of the *Controlled Wood Fibre Complaint Form* (Field Verification) is completed within 2 months. If no further action is required, they ensure a copy of the form (PART I - III) is filed with the Environmental Services Coordinator. If additional actions are required, they complete PART III and forward the complete form (PARTS I – III) to the Environmental Services Coordinator.

If non-compliance with the FSC Controlled Wood requirements is confirmed, the Environmental Services Coordinator advises the Mill Manager, Controller, Wood Buyer and Supplier that the Supplier is to be excluded from the company's FSC Controlled Wood category. The Environmental Services Coordinator informs FSC Canada and the relevant FSC accredited Certification Body.

Where the company wishes to resume accepting deliveries from the Supplier the Environmental Services Coordinator, or a designate, is to work with the Supplier towards bringing the Supplier's operation back into compliance with the FSC Controlled Wood standard. Once the Supplier has proven to the Environmental Services Coordinator that the operation is in conformance with the FSC Controlled Wood standard the Environmental Services Coordinator will notify the Mill Manager, Controller and Wood Buyer and may resume receipt of deliveries from the Supplier.

If there are frequent non-compliances with the FSC Controlled Wood requirements in area(s) deemed to be low risk, the Environmental Services Coordinator conducts a review of the risk assessment and revises the system as required.

Responsibilities

Environmental Services Coordinator

- Ensures company representatives are aware of their roles in the case of complaints.
- Assigns staff as required to address complaints.
- Ensures efforts made to work with suppliers to ensure compliance following any complaints.
- Keeps records of all complaints

Document Control System

Name:	Details of Changes:	Date:
Chantal Alkins	Completion of Original Document	July 19, 2019
Chantal Alkins	Document Completed and DDS Implemented	December 20, 2019
Chantal Alkins	Reviewed and conducted revisions to the following: Under 3. Supply areas-Controlled wood category 1. I changed the Risk designation to 'Low Risk' (Page 2). Changed 2.3 Specified Risk Wood harvested in violation of traditional and human rights from low risk to specified risk in both documents. Added the language ", Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) (O. Reg. 242/08) provides for regulatory exemptions for forest operations in Crown forests has an extension until to June 30, 2021." Page 14 3.2 Changed the language from "No harvesting within these IFLs to 1. Fibre is not procured from within any of the Specified Risk IFLs within the Supply area of the Kenogami Forest, Pic Forest, Lake Nipigon Forest and the Ogoki Forest. Also updated the Control Measure Statement to say the same as above.	August 20-21, 2020
Chantal Alkins	ANNUAL REVIEW-Internal Audit. Edits to 3.1 Specified Risk for the following Eco Regions in the supply area: Midwestern Canadian Shield forest (50); Central Canadian Shield forests (43), and; Eastern Forest – Boreal Transition (5) : Moved the 2018-2019 Ontario Critical Habitat Reports for Woodland Caribou Boreal Population, to the beginning of the evidence listing, since that is where stakeholder engagement is listed. Added a link to Ontario's Woodland Caribou Conservation Plan. Added link to the following document for evidence Best Management Practices for Aggregate Activities and Woodland Caribou in Ontario. Re-worded the Control Measure Statement to emphasize Ontario's progress and stakeholder consultation on woodland caribou. Re-worded the Control Measure Verification.	October 18, 2020
Chantal Alkins	Annual Review and new control measures added to 3.1	October 19 & 26 th 2021

--	--	--