

# Forest Certification UPDATE



## DOMTAR INC.

### DESCRIPTION OF COMPANY

Domtar Inc. operates on the Wabigoon and Trout Lake Forests in Northwestern Ontario under Sustainable Forest Licences issued by the Ontario Ministry of Natural Resources under the Crown Forest Sustainability Act (CFSA). These operations supply approximately half of the wood used in its pulp mill facility in Dryden, Ontario. The remaining wood is procured through contractors operating on adjacent public lands subject to the CFSA, an act and supporting regulations consistent with the principles of the SFI standard. Wood may also be procured from Manitoba Provincial lands or potentially northern U.S. states. Incidental wood volumes may also come from private land within the region.

Spill kits and fire extinguishers at a fuel cache



### BACKGROUND

During the period of January 25 to 29, 2016 Domtar Inc. underwent a Re-assessment audit to the SFI 2015-2019 Forest Management Standard and SFI 2015-2019 Fiber Sourcing Standard standards. The registration cycle is over 3 years with surveillance audits conducted annually. This report summarizes the audit process and the results of the SAI Global evaluation.

### SCOPE OF CERTIFICATION

Forest management activities with the exception of activities carried out under Direct Licence to Harvest Forest Resources under the Crown Forest Sustainability Act Section 27, subsection (1) Licence No. 553240 – Planning, harvesting, transportation and silviculture on the Wabigoon & Trout DFA's in Ontario, Canada. The SFI 2015-2019 Forest Management Standard meets and exceeds the requirement of the earlier SFI 2010-2014 SFI Standard (Section 2), therefore fibre sold under this certificate counts as 100% SFI and 100% PEFC certified forest content.

### EXECUTIVE SUMMARY

The Sustainable Forestry Initiative® (SFI®) program third-party audit was undertaken by SAI Global. SAI Global is an independent third party registrar that is accredited by the ANSI-ASQ National Accreditation Board (ANAB) for registrations to SFI 2015-2019 Forest Management Standard and SFI 2015-2019 Fiber Sourcing Standard. This ensures the integrity and credibility of the audit process.

The audit assessed active and completed harvest operations on the Trout Lake Forest and Wabigoon Forest through interviews with the company staff, contractors and overlapping licensees. The audit also assessed the SFI and supporting EMS documentation and records at the Domtar office. The audit used site visits and interviews with contractors logging on the Sandilands Forest in Manitoba to assess the Domtar Dryden procurement system. Five minor non-conformances (Forest management 4; Fibre Sourcing 1) and three opportunities for improvement were identified. Three positive aspects of the registration program were also noted.

**THE AUDITORS**

The SAI Global audit team who performed the audit consisted of Rod Seabrook (lead auditor) and Laird Van Damme. Mr. Seabrook holds a Certified Environmental Professional/Lead Auditor designation with ECO Canada and is an Associate Member of the Ontario Professional Foresters Association. Mr. Van Damme is a Registered Professional Forester.

**AREAS OF NON-CONFORMANCE**

Type	Performance Measure #	Description
Minor	FM 9.1	Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations.
Minor	FM 9.2	SFI 2015-2019 Standards and Rules Section 11.3 Within 45 days of receipt of the complaint, the Program Participant shall respond to the complainant and forward a copy of the complaint and its response to the Program Participant's certification body for future review via surveillance or certification audits.
Minor	FM 9.1	Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations.
Minor	11.5	Program participants shall have written agreements for the use of qualified logging professionals and/or certified logging professionals (where available) and/or wood producers that have completed training programs and are recognized as qualified logging professionals.
Minor	FS 4.1.2	Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations and take steps to avoid illegal logging.

**OPPORTUNITIES FOR IMPROVEMENT**

- FM 3.1.2 Consider reviewing spill kit contents and their use with forest workers as part of routine training
- FM 2.1.2 Consider having regeneration survey crews provide an opinion as to whether plot data is an accurate reflection of overall stand composition
- FM 2.3.1 OFI 1 Consider mapping fine textured soils to enhance implementation of Harvest SOPS to avoid operations during wet conditions

## **CORRECTIVE ACTION PLANS**

Domtar Inc. has developed corrective action plans to address the root causes of the non-conformities identified during the audit. The root cause analysis and proposed corrective actions have been reviewed by SAI Global Lead auditor to ensure that they are appropriate, and fully address the identified deficiencies. At the next annual audit a follow-up on the implemented corrective actions will be done to confirm that the corrective actions were appropriate and effective in ensuring the non-conforming situation will not reoccur.

## **COMPLAINTS**

No complaints of inconsistent practices have been received; therefore the complaint handling process could not be verified.

## **POSITIVE ASPECTS**

- Efforts made by Eacom and its contractors in addressing deficiencies observed during the previous audit and the application of resources to ensure operations are compliant going forward
- Awareness of operators of the meaning of the term Sustainable Forestry
- Overall professionalism of operations

### **SFI 2015-2019 Forest Management Standard Periodic Assessments**

Major non-conformances:	0
Minor non-conformances:	4
Opportunities for Improvement:	3
Positive Aspects:	3

### **SFI 2015-2019 Fiber Sourcing Standard Periodic Assessments**

Major non-conformances:	0
Minor non-conformances:	1
Opportunities for Improvement:	0
Positive Aspects:	0

### **Major Non-Conformances**

Pervasive or critical to the achievement of the SFI objectives. All major non-conformances require an action plan to be implemented by the auditee within 90 days of an initial audit and subsequently 60 days or registration cannot be achieved/maintained.

### **Minor Non-Conformances**

Isolated incidents that are non-critical but must be addressed before the next surveillance audit to maintain compliance to the SFI standard.

### **Opportunity for Improvement**

Are not non-conformances but are comments on specific areas where improvements can be made.

### **Positive Aspects**

Areas that are deemed to be of best practices.

**EVIDENCE OF CONFORMITY TO THE SFI 2015-2019 FOREST MANAGEMENT STANDARD**

**Objectives Audited**

Objective 1	Forest Management Planning	X
Objective 2	Forest Health and Productivity	X
Objective 3	Protection and Maintenance of Water Resources	X
Objective 4	Conservation of Biological Diversity	X
Objective 5	Management of Visual and Recreational Benefits	X
Objective 6	Protection of Special Sites	X
Objective 7	Efficient Use of Forest Resources	X
Objective 8	Recognize and Respect Indigenous Peoples' Rights	X
Objective 9	Legal and Regulatory Compliance	X
Objective 10	Forestry Research, Science and Technology	X
Objective 11	Training and Education	X
Objective 12	Community Involvement and Landowner Outreach	X
Objective 13	Public Land Management Responsibilities	X
Objective 14	Communications and Public Reporting	X
Objective 15	Management Review and Continual Improvement	X

**Evidence Observed**

Environmental management system (EMS) Manual	X	Employee observation forms (species at risk, invasive plants, other values)	X
Written policies	X	Pre-work discussions/meeting records	X
Standard Operating Procedures (SOPs) for best management practices	X	Monitoring records for non-timber values	X
EMS and SFI field handbook	X	Utilization records	X
Training records (staff and contractors)	X	Laws, legislation, regulations records	X
SFI/EMS training agenda	X	Annual management review records	X
Timber supply review	X	Internal audit records	X
Maps (pre-harvest, harvest, post-harvest, and silviculture)	X	Corrective action logs	X
Non-timber values impact assessments (riparian, visual, recreation, biodiversity, cultural heritage, other: )	X	Records of public inquiries and complaints	X
GIS inventories (soils, forest, land classification, non-timber values)	X	Stakeholder communications records	X
Long term management plans and sustainable harvest level calculation	X	Agreements and communications with Indigenous communities	X
Operational plans (annual, cutblock level)	X	Logging agreements and/or contracts	X
Wet/adverse weather plans or guidelines	X	Wood producer training programs	X
Reforestation plans	X	Wood producer information package	X
Spill prevention and response plan	X	SFI Annual Report	X
Green-up records	X	SFI and company websites	X
Free to grow records	X	SFI Implementation committee (participation/support)	X
Harvest inspection records	X	Climate change information and/or meeting minutes	X
Pre-harvest inspection records	X	Support for research and science	X
Post-harvest inspection records	X	External audit field inspections	X
Cutblock size calculations	X	External audit interviews (office and field)	X

**CERTIFICATION DECISION SFI 2015-2019 FOREST MANAGEMENT STANDARD**

**Re-registration Audit**

Based on the results of this re-registration audit it has been determined that the management system of Domtar Inc. is effectively implemented and meets the requirements relative to the scope of registration and audit criteria. The action plans related to the non-conformances have been reviewed and considered acceptable. Implementation of action plans for the minor non-conformance will be reviewed at the next surveillance audit. Therefore, a recommendation for registration is made to SAI Global.

**EVIDENCE OF CONFORMITY TO SFI 2015-2019 FIBER SOURCING STANDARD**

**Objectives Audited**

<b>Fiber Sourcing Within the United States and Canada</b>		
Objective 1	Biodiversity in Fiber Sourcing	X
Objective 2	Adherence to Best Management Practices	X
Objective 3	Use of Qualified Resource and Qualified Logging Professionals	X
Objective 4	Legal and Regulatory Compliance	X
Objective 5	Forestry Research, Science, and Technology	X
Objective 6	Training and Education	X
Objective 7	Community Involvement and Landowner Outreach	X
Objective 8	Public Land Management Responsibilities	X
Objective 9	Communications and Public Reporting	X
Objective 10	Management Review and Continual Improvement	X

<b>Fiber Sourcing Outside the United States and Canada</b>		
Objective 11	Promote Conservation of Biological Diversity, Biodiversity Hotspots and High-Biodiversity Wilderness Areas	N/A
Objective 12	Avoidance of Controversial Sources including Illegal Logging	N/A
Objective 13	Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws	N/A

**Evidence Observed**

Environmental management system (EMS) Manual	X	Evaluation of best management practices	X
Written policies	X	Pre-work discussions/meeting records	X
Standard Operating Procedures (SOPs) for best management practices	X	Utilization records	X
EMS and SFI field handbook	X	Laws, legislation, regulations records	X
Training records (staff and contractors)	X	Logging agreements and/or contracts	X
SFI/EMS training agenda	X	Wood producer training programs	X
Cutting/harvesting permits	X	Policies provided to wood producers	X
Operational plans (annual, cutblock level)	X	List of qualified logging professional/certified logging professional	X
Wet/adverse weather plans or guidelines	X	Program to assess and address risk of Illegal logging	X
Best management practices monitoring records	X		

Additional evidence for Objectives 11 -13 Sourcing from Outside Canada and USA			
Use of information from sources such as: Biodiversity hot spots, high biodiversity wilderness areas, rare species, habitat information	N/A	When identified, Program to address significant risk for countries without effective laws	N/A
Info about direct supplier's application of principle of sustainable forestry	N/A	When identified, Program to address significant risk of Illegal logging	N/A
Program in place to reduce risk of Illegal logging	N/A		N/A
Program in place to assess risk for countries without effective laws	N/A		N/A

**CERTIFICATION DECISION SFI 2015-2019 FIBER SOURCING STANDARD**

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Wildlife tree retention and advanced growth protection in  
harvest block 327 cut using a processor and forwarder logging system



SAI Global forestry specialist group registers/certifies forest companies to ISO 14001, OHSAS 18001, CSA Z809 and CSA Z804 SFM, SFI Forest Management, SFI CoC, SFI Fiber Sourcing, SFI Certified Sourcing Label, PEFC CoC, FSC® Forest Management, FSC® CoC.

The group, led by Sylvain Frappier, Technical Manager - Forestry, consists of a highly qualified team of professional foresters, technical and industry experts.

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