



# FSC® CONTROLLED WOOD - PUBLIC SUMMARY OF DUE DILIGENCE SYSTEM for EACOM Timber Corporation

## A. General Information

| Certificate Holder Information  |  |
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| Certificate holder name:  | EACOM Timber Corporation   |
| FSC Certificate code:   | NC-COC-001654; NC-CW-001654  |
| DDS Contact Person:   | Stephanie Parzei, Forest Environmental Management Coordinator  |
| Summary of changes made to the organization's DDS System (changes to suppliers' structure, risk assessment, risk designation, mitigation/control measures, etc.): | EACOM's DDS was updated in December 2019 to align with the new FSC Canada National Risk Assessment (NRA) |

## B. Feedback/Complaints

| Please contact the person listed below by email, letter or phone: |  |
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| Name:   | Stephanie Parzei   |
| Position:   | Forest Environmental Management Coordinator                              |
| Address:  | 100 Old Nairn Rd., Nairn Centre, P0M 2L0                                 |
| Phone:  | 705-869-4020 x271  |
| Email:  | <a href="mailto:stephanie.parzei@eacom.ca">stephanie.parzei@eacom.ca</a> |

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|-------------------------------------|---|
| <p><b>Complaints Procedure:</b></p> | <ol style="list-style-type: none"><li>1. All complaints associated with supplies of controlled wood will be referred to the Forest Environmental Management (FEM) Coordinator, Ontario.</li><li>2. The FEM Coordinator will acknowledge the complaint upon receipt.</li><li>3. The FEM Coordinator will inform the stakeholder of the complaint procedure and will assess the evidence supporting the complaint (or request evidence) within 2 weeks of receiving the complaint, to determine the relevance of the complaint.</li><li>4. If the evidence is considered relevant, the FEM Coordinator will discuss options with the complainant to aim to resolve the complaint, before further actions are taken.</li><li>5. The FEM Coordinator will forward any complaints deemed to be substantial to the certification body and to the FSC National Office for the supply area within 2 weeks of receipt of the substantial complaint. Information on steps to be taken to resolve the complaint, as well as how the precautionary approach will be used, will be included.</li><li>6. While the complaint is pending, the precautionary approach will be used for the relevant material.</li><li>7. For substantial complaints, the FEM Coordinator, or designate, will conduct a field verification of the supply/supplier within 2 months of receipt of the complaint. The purpose of the field verification is to determine compliance with the FSC Controlled Wood requirements.</li><li>8. If the complaint is verified as substantial, based on the field verification, the corrective actions to be taken by the supplier and the means to enforce its implementation will be determined.</li><li>9. Corrective actions will be verified to determine if they have been effectively completed.</li><li>10. If a corrective action cannot be determined, enforced, or completed, the relevant material and/or supplier will be excluded by EACOM.</li><li>11. The FEM Coordinator will inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards resolution.</li><li>12. Copies of relevant correspondence and records of complaints received and actions taken will be maintained on file.</li></ol> |
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## C. Supply Chain

| Site Name                                  | Non-certified material type sourced | Exact Number of suppliers | Approx. Number of sub-suppliers | Supplier types      | Average length of non-FSC supply chain | Risk of mixing with non-eligible input   |
|--|-------------------------------------|---------------------------|---------------------------------|---------------------|--|--|
| Ontario (Elk Lake, Gogama, Nairn, Timmins) | Logs                                | 58                        |                                 | Harvest Contractors | 1                                      | <p><b>No Risk of Mixing</b></p> <ul style="list-style-type: none"> <li>• Movement of Crown forest resources must be authorized by the MNRF, under an Authority to Haul</li> <li>• Bills of Lading, indicating origin, approval number, and load specifications must accompany all loads from origin in the forest to the mill</li> <li>• The MNRF has authority to conduct periodic audits to verify the origin of all wood during transportation or at the mill</li> <li>• Records of both Crown and private forest resources harvested are kept and made available for inspection by MNRF, as requested</li> </ul>   |
| Quebec (Matagami, Val d'Or)                | Logs                                | 19                        |                                 | Harvest Contractors | 1                                      | <p><b>No Risk of Mixing</b></p> <ul style="list-style-type: none"> <li>• Movement of Crown forest resources must be authorized by the MFFP, under an Authority to Haul (feuillelet AT)</li> <li>• Bills of Lading, indicating origin, approval number, and load specifications must accompany all loads from origin in the forest to the mill</li> <li>• The MFFP has authority to conduct periodic audits to verify the origin of all wood during transportation or at the mill</li> <li>• Records of both Crown and private forest resources harvested are kept and made available for inspection by MFFP, as requested</li> </ul>   |
| Sullivan                                   | Lumber                              | 8                         | 8                               | Sawmills            | 2                                      | <p><b>No Risk of Mixing</b></p> <p>For the first tier, from forest to primary manufacturer, there is no risk of mixing (same justification as for Ontario and Quebec sites above).</p> <p>For the tier where lumber is delivered from the primary manufacturer directly to Sullivan:</p> <ul style="list-style-type: none"> <li>• Each load of lumber received by Sullivan is tracked from the primary manufacturer using a shipping Bill of Lading, which indicates the originating mill and product specifications</li> <li>• For lumber received from EACOM mills, the origin of material can be tracked for every load of roundwood that is received directly from the forest at an EACOM mill, through EACOM's internal scaling system.</li> <li>• For lumber from external mills, Sullivan confirms the origin of material by having each external supplier complete a questionnaire about its supply area and risk of mixing, as well as complete a wood supply declaration indicating that the roundwood from the forest does not come from unacceptable sources. Every quarter a randomly selected external supplier is asked to provide proof of origin (e.g. sample of BOLs). Only material from approved suppliers is accepted at the mills and this list is updated regularly.</li> </ul> |



## D. Risks Assessments

| Country | Supply Area       | Risk Designation          | Type of Risk Assessment | Name of Risk Assessment                                    | Reference to applicable control measure No. (listed at section E. below)                     |
|---------|-------------------|---------------------------|-------------------------|--|--|
| Canada  | Northeast Ontario | Cat 1: Low risk           | FSC                     | FSC National Risk Assessment for Canada<br>FSC-NRA-CA V2-0 | Low Risk - N/A   |
|         |                   | Cat 2: (Un)specified Risk |                         |  | Specified Risk for 2.3 - See #1 in Section E   |
|         |                   | Cat 3: (Un)specified Risk |                         |  | Specified Risk for 3.2 - See #2 in Section E   |
|         |                   | Cat 4: Low risk           |                         |  | Low Risk - N/A   |
|         |                   | Cat 5: Low risk           |                         |  | Low Risk - N/A   |
|         | Quebec            | Cat 1: Low risk           | FSC                     | FSC National Risk Assessment for Canada<br>FSC-NRA-CA V2-0 | Low Risk - N/A   |
|         |                   | Cat 2: (Un)specified Risk |                         |  | Specified Risk for 2.3 - See #3 in Section E   |
|         |                   | Cat 3: (Un)specified Risk |                         |  | Specified Risk for 3.1 - See #4 in Section E<br>Specified risk for 3.2 - See #5 in Section E |
|         |                   | Cat 4: Low risk           |                         |  | Low Risk - N/A   |
|         |                   | Cat 5: Low risk           |                         |  | Low Risk - N/A   |

## E. Control Measures

| No. | Type            | Description of the Implemented control measure  |
|-----|-----------------|---|
| 1   | FSC Recommended | <p><b>Specified Risk for 2.3 – Control Measure 1 in FSC Canada NRA is met.</b></p> <p>1. <i>Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan.</i></p>  |
| 2   | FSC Mandatory   | <p><b>Specified Risk for 3.2 – Control Measure 2 in FSC Canada NRA for IFLs is met.</b></p> <p>2. <i>Forest operations do not reduce an IFL below 50,000 ha, AND all meet applicable options below:</i></p> <p>a. <i>For an IFL between 50,000 and 62,500 ha, cumulative impacts forest operations do not affect more than 10% of the IFL.</i></p> <p>b. <i>For an IFL between 62,501 and 75,000 ha, cumulative impacts forest operations do not affect more than 20% of the IFL.</i></p> <p>c. <i>For an IFL between 75,001 and 200,000 ha, cumulative impacts forest operations do not affect more than 30% of the IFL.</i></p> <p>d. <i>For an IFL between 200,001 and 500,000 ha, cumulative impacts forest operations do not affect more than 35% of the IFL.</i></p> <p>e. <i>For an IFL larger than 500,001 ha, cumulative impacts forest operations do not affect more than 45% of the IFL.</i></p> |
| 3   | FSC Recommended | <p><b>Specified Risk for 2.3 – Control Measure 1 in FSC Canada NRA is met.</b></p> <p>1. <i>Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan.</i></p>  |
| 4   | FSC Mandatory   | <p><b>Specified Risk for 3.1 – Control Measure 8b in FSC Canada NRA is met.</b></p> <p>8. <i>Evidence demonstrates that forests in the sourcing area have a management plan<sup>1</sup> that contributes to the recovery of woodland caribou critical habitat*, as identified in the Federal Recovery Strategy.</i></p> <p><i>The management plan identifies and implements:</i></p> <p>b. <i>Harvest deferrals, set asides, and/or protection areas<sup>2</sup> within areas of critical habitat*, where forest operations are not permitted.</i></p>  |
| 5   | FSC Mandatory   | <p><b>Specified Risk for 3.2 – Control Measure 2 in FSC Canada NRA for IFLs is met.</b></p> <p>2. <i>Forest operations do not reduce an IFL below 50,000 ha, AND all meet applicable options below:</i></p> <p>a. <i>For an IFL between 50,000 and 62,500 ha, cumulative impacts forest operations do not affect more than 10% of the IFL.</i></p> <p>b. <i>For an IFL between 62,501 and 75,000 ha, cumulative impacts forest operations do not affect more than 20% of the IFL.</i></p> <p>c. <i>For an IFL between 75,001 and 200,000 ha, cumulative impacts forest operations do not affect more than 30% of the IFL.</i></p> <p>d. <i>For an IFL between 200,001 and 500,000 ha, cumulative impacts forest operations do not affect more than 35% of the IFL.</i></p> <p>e. <i>For an IFL larger than 500,001 ha, cumulative impacts forest operations do not affect more than 45% of the IFL.</i></p> |

## F. Stakeholder Consultation by the Organization

**Not applicable** (The organization has not conducted stakeholder consultation)

*Note: Stakeholders consultation is only required as a control measure when unspecified risk has been identified for CW Cat 2 or 3 in a company or old NRA risk assessment. The Organization may also choose to conduct stakeholder consultation to verify the adequacy of its control measures.*

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| <b>Area for which Stakeholder Consultation was conducted:</b> | N/A – Stakeholder consultation not required |
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## G. Engagement of Experts by the Organization

**Not applicable** (The organization has not engaged experts)

*Note: Engagement of expert is required to justify the adequacy of control measures developed by the Organization for CW cat 2 or 3, and when outsourcing the development of an extended risk assessment.*

| Name                                      | Qualification | License/Registration | Scope of service |
|---|---------------|----------------------|------------------|
| N/A - technical experts were not required |               |                      |                  |

## H. Field Verification by the Organization

**Not applicable** (The organization's control measures do not require field verification)

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| <b>Justification for sampling rate:</b> | N/A – field verification was not required |
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