AMEX Bois Franc, AMEX West, Scierie VOG et PRIMEWOOD LUMBER

FSC® CONTROLLED WOOD

UNITED STATES RISK ASSESSMENT

SOMMAIRE PUBLIC | PUBLIC SUMMARY

(FSC-STD-40-005 V3-1)

MAY 14 2018

PREPARED IN SUPPORT OF THE DUE DILIGENCE SYSTEM

GFG-CAMINT

A. COMPANY INFORMATION

Company name		9293-8760 Québec Inc., dba Primewood Inc.
Certificate number:		SAI-COC-002514
Controlled wood Certificate number:		SAI-CW-002514
First Issue Date:		2010-11-08
Expiry Date:		2019-03-31
Country:		USA
Company address:		1150, rue Labonté Drummondville, Québec J2C 5Y4 Canada
Contact detail:	**Contact person:**	Guillaume Genest,
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	e-mail Address	wgenest@primewood-lumber.com
Assessment done by:		Jean-François Légaré, ing.f.
Relation to the company:		Forestry consultant
Date:		May 14, 2018
Signature		*JFLégaré*

B. ORIGIN OF TIMBER

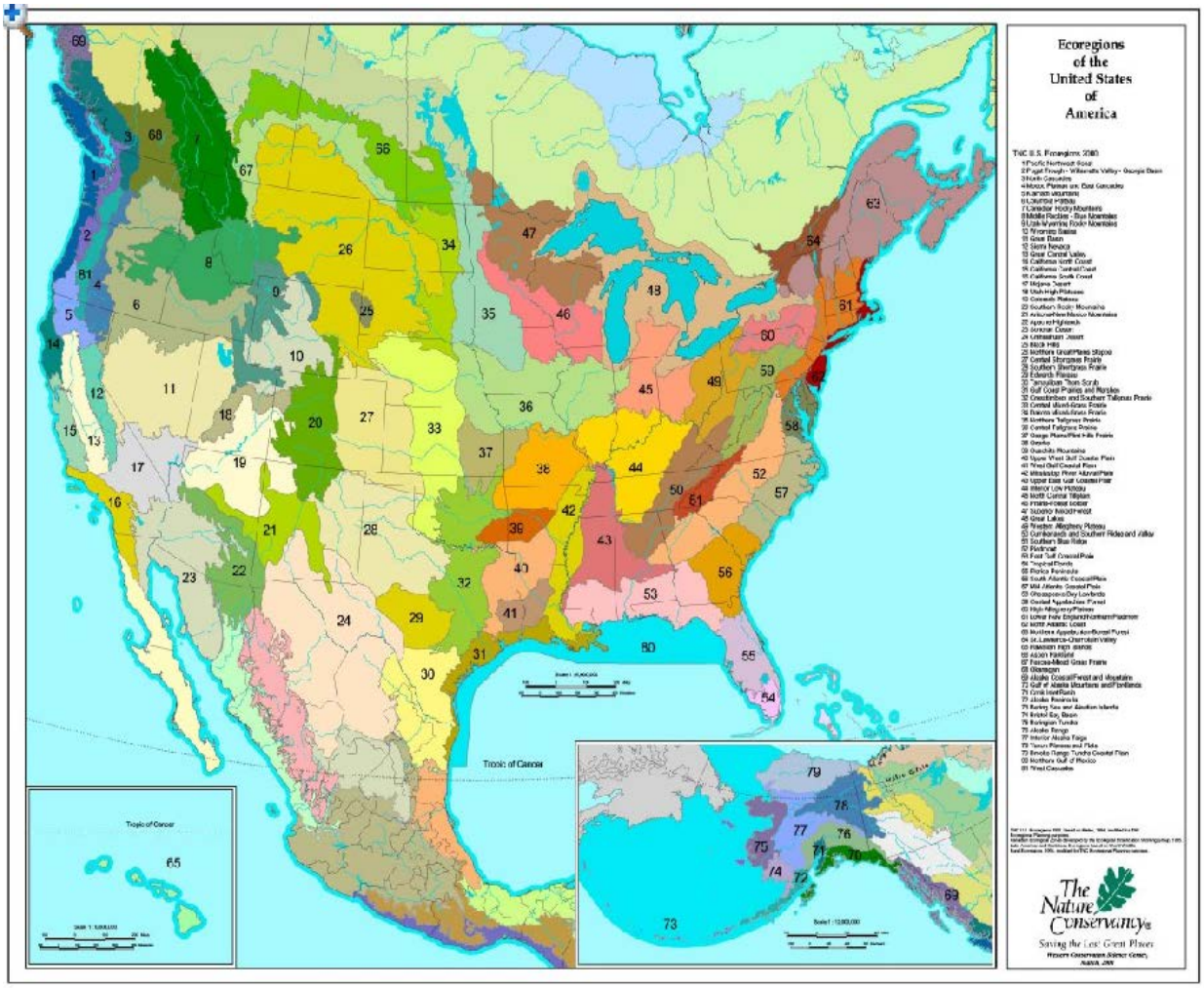
In the United States, AMEX Bois Franc, AMEX WEST, Scierie VOG and PrimeWood Lumber are mainly sourced from the northeastern forests of the United States. The supply area targeted by the chain of custody covers the states of Vermont, Maine, New Hampshire, Massachusetts, Rhode Island, Connecticut, New York, Pennsylvania, New Jersey, Delaware, Maryland, Alabama, Iowa, Illinois, Indiana, Kentucky, Michigan, Missouri, North Carolina, Ohio, Tennesse, Virginia and West Viginia. Supply comes from public lands and private lands. In the northeastern United States, many forests are certified FSC, SFI or American tree farm system.

C. WWF ECOREGION

Country:	USA	
District	State of Vermont, Maine, New Hampshire, Massachusetts, Rhode Island, Connecticut, New York, Pennsylvania, New Jersey, Delaware, Maryland, Alabama, Iowa, Illinois, Indiana, Kentucky, Michigan, Missouri, North Carolina, Ohio, Tennesse, Virginia, West Viginia,	
WWF Ecoregions	**WWF ecoregion code**	**WWF ecoregion name**
	NA0401	Allegheny Highlands forests
	NA0402	Appalachian mixed mesophytic forests
	NA0403	Appalachian-Blue Ridge forests
	NA0404	Central U.S. hardwood forests
	NA0406	Eastern forest-boreal transition
	NA0407	Eastern Great Lakes lowland forests
	NA0409	Mississippi lowland forests

	NA0410	New England-Acadian forests	
	NA0411	Northeastern coastal forests	
	NA0413	Southeastern mixed forests	
	NA0414	Southern Great Lakes forests	
	NA0517	Middle Atlantic coastal forests	
Risk Assessment Level	**Country**	**District**	**FMU**
	Low	**Low**	**-**

Figure 1. Ecoregions of the United States


Ecoregions
of the
United States
of
America
The
Nature
Conservancy
Saving the Last Great Places
Tropic of Cancer
Tropic of Cancer

A. Company risk assessment

Considering that the complete national risk assessment for the United States will not be published until november 30, 2018 (https://ca.fsc.org/en-ca/standards/national-risk-assessment-01), the company has conducted its own risk analysis in accordance with Annex A of FSC-STD-40-005 V3- 1. Sections 1 and 5 of the National Risk Analysis for the United States approved by the FSC were used.

In conclusion, all supply zones and the due diligence system of AMEX Bois Franc, Amex West, Scierie VOG and PrimeWood Lumber present a low risk that the materials received come from unacceptable sources.

The Company risk assessment is available upon request and made public on the FSC website (http://info.fsc.org/) through the Registrar during the external audit.

For questions, comments, or complaints about the organization's risk assessment, please contact:

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1. ILLEGALLY HARVESTED WOOD

1.1 Evidence of enforcement of logging related laws in the supply area.

There is no additional known information, and the FSC National Office has not provided any additional information, that contradicts the assessment results provide by the **Centralized National Risk Assessment for USA**. Therefore, the source area can be considered Low risk

Sources of information

- FSC-CNRA-USA V1-0 EN, section 1

Risk Assessment designation

Low risk

1.2 There is evidence in the supply area demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.

There is no additional known information, and the FSC National Office has not provided any additional information, that contradicts the assessment results provide by the **Centralized National Risk Assessment for USA**. Therefore, the source area can be considered Low risk

Sources of information

- FSC-CNRA-USA V1-0 EN, section 1

Risk Assessment designation:

Low risk

1.3 There is little or no evidence or reporting of illegal harvesting in the supply area

There is no additional known information, and the FSC National Office has not provided any additional information, that contradicts the assessment results provide by the **Centralized National Risk Assessment for USA**. Therefore, the source area can be considered Low risk

Sources of information

- FSC-CNRA-USA V1-0 EN, section 1

Risk Assessment designation:

Low risk

1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade

Accordingly to the latest studies published by Transparency International on their Web site http://www.transparency.org/news/feature/corruption_perceptions_index_2016. USA has an excellent corruption perception index 2016 with a score of 74 - 18th rank/176.

There is no additional known information, and the FSC National Office has not provided any additional information, that contradicts the assessment results provide by the Centralized National Risk Assessment for USA. Therefore, the source area can be considered Low risk

Sources of information

- FSC-CNRA-USA V1-0 EN, section 1
- http://www.transparency.org/news/feature/corruption_perceptions_index_2016
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/

Risk Assessment designation

Low risk

2 WOOD HARVESTED IN VIOLATION OF TRADITIONAL OR CIVIL RIGHTS

2.1 There is no UN Security Council ban on timber exports from the country concerned.

There is no UN Security Council ban on timber exports from USA. Currently, there are no bans in any other countries; Liberia was subject to a ban from 2003-2006.

Sources of information

- SC Global Risk Assessment http://www.globalforestregistry.org/
- http://www.un.org/apps/news/story.asp?NewsID=18934&Cr=liberia&Cr1=
- Global Witness. http://www.globalwitness.org
- http://www.un.org/esa/forests/
- http://www.globalwitness.org/campaigns/environment/forests).
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/

Risk Assessment designation

Low risk

2.2 The country or supply area is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber).

United States of America are not designated a source of conflict timber. Research and advocacy organizations do not identify these countries as areas with natural resource conflict.
According to the FSC-Global Forestry Registry the United States is not associated with or designated as a source of conflict timber. Additionally, the USAID agency does not list the US as a source of conflict timber.

Sources of information

- FSC-CNRA-USA V1-0 EN, section 2.1

Risk Assessment designation

Low risk

2.3 There is no evidence of child labour or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the supply area concerned.

There is no known situation or evidence where child labour would have been used in harvesting operations in United States of America, or situations that could have been in violation of ILO Fundamental Principles and Rights.

Adopted in 1998, the ILO Declaration on Fundamental Principles and Rights at Work is an expression of commitment by governments, employers' and workers' organizations to uphold basic human values - values that are vital to our social and economic lives.

The Declaration covers four areas:

- Freedom of association and the right to collective bargaining;
- The elimination of forced and compulsory labour;
- The abolition of child labour, and;

- The elimination of discrimination in the workplace. »

Labour law in the United States of America prevents violation of fundamental principles and rights at work.

Sources of information

- FSC-CNRA-USA V1-0 EN, section 2.1
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/

Risk Assessment designation

Low risk

2.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the supply area concerned.

In United States, enforcement of laws and bylaws is supported by a legal system that acts as a warranty that traditional rights will be protected. Also, equitable processes are in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity.

The United States have several treaties with Native people, which acknowledge them as Nations and give them the right to manage their lands. Besides, there are consulting and conflict resolution mechanisms in place for activities impacting Native people lands.

In the U.S., Native Americans with a land base are recognized as Sovereign Nations and accorded rights to manage their land and affairs. In addition, Native Americans have an equitable process to resolve conflicts over land management. Through the U.S. court system, many Native American tribes have challenged, won decisions, and resolved issues concerning land management and use rights. There are many examples within the U.S. where tribes have successfully been able to exercise treaty rights through formal and informal conflict resolutions systems.

Sources of information

- International Labor Organization.. “Convention No. 169.” Indigenous and Tribal Peoples. http://www.ilo.org/indigenous/Conventions/no169/lang--en/index.htm
- Aboriginal Affairs and Northern Development USA.http://www.aadnc-aandc.gc.ca/eng/1100100010002Indigenous Peoples Organizations
- http://www.ainc-inac.gc.ca/al/indexeng.Asp
- Secrétariat aux affaires autochtones (QC): http://www.saa.gouv.qc.ca/index.asp
- Ministry of Aboriginal Affairs, Ontario : http://www.aboriginalaffairs.gov.on.ca/francais/default.asp
- Aboriginal Affairs Secretariat (NB): http://www2.gnb.ca/content/gnb/en/departments/aboriginal_affairs.html
- http://www.gov.bc.ca/arr/
- http://www.for.gov.bc.ca/haa/
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/

Risk Assessment designation:

Low risk

2.5 There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the supply area concerned.

There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the concerned forest areas of USA.

USA is member of the ILO but has not ratified ILO Convention 169 but is in overall compliance with its measures, which include: the right of tribal and indigenous peoples to enjoy fundamental human rights and freedoms without discrimination; a right to consult with the government on issues that affect them; and a right to decide their own priorities for social, cultural, and economic development.

As a member of the ILO, the U.S. is obliged "to respect, to promote and to realize" the principles contained in the Declaration.

Sources of information

- FSC National Initiatives and Regional Offices contacts www.fsc.org
- International Labor Organization. "Convention No. 169." Indigenous and Tribal Peoples. http://www.ilo.org/indigenous/Conventions/no169/lang--en/index.htm
- FSC Global Risk Assessment http://www.globalforestregistry.org/
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/

Risk Assessment designation:

Low risk

3 WOOD HARVESTED FROM FOREST IN WHICH HIGH CONSERVATION VALUES ARE THREATENED BY MANAGEMENT ACTIVITIES

3.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant HCVs.

The ecoregions have been identified based on WWF Ecoregion definitions and mapping (https://www.worldwildlife.org/science/wildfinder/).

HCVFs were identified using the information sources recommended by the FSC Controlled Timber Standard (FSC-STD-40-005 V3-1) for risk assessment. These HVCF are shown in Table 1 below.

For this indicator, the supply area may be considered low risk in relation to threat to HCVs if:

a) Material does not originate from any of the mapped areas of HCVs (as listed in 3.1), or

b) There are no ecoregionally significant HCVs in the supply area according to independent verifiable information at the supply area/supply unit level (NGO reports, environmental impact assessments, etc.).

See table 1 *HCVF Summary by WWF ecoregion* below.

Table 1. HCVF Summary by WWF ecoregion

WWF Ecoregions		WWF Global 200	WWF Conservation status	Conservation International's Biodiversity Hotspot	IUCN Centre of Plant Diversity	High-Biodiversity Wilderness area.	Global Forest Watch Intact Forest	Caribou Woodland Habitat
Code	Name							
NA0401	Allegheny Highlands forests		Critical/Endangered					
NA0402	Appalachian mixed mesophytic forests	Yes	Critical/Endangered	-	-	-	-	-
NA0403	Appalachian-Blue Ridge forests	Yes	Vulnerable	-	-	-	-	-
NA0404	Central U.S. hardwood forests	-	Critical/Endangered	-	-	-	-	-
NA0406	Eastern forest-boreal transition	-	Vulnerable	-	-	-	Yes	-
NA0407	Eastern Great Lakes lowland forests	-	Critical/Endangered	-	-	-	-	-
NA0409	Mississippi lowland forests	-	Critical/Endangered	-	-	-	-	-
NA0410	New England-Acadian forests	-	Critical/Endangered	-	Serpentine	-	-	-
NA0411	Northeastern coastal forests	-	Critical/Endangered	-	-	-	-	-
NA0413	Southeastern mixed forests	-	Critical/Endangered	-	-	-	-	-
NA0414	Southern Great Lakes forests	-	Critical/Endangered	-	-	-	-	-
NA0517	Middle Atlantic coastal forests	-	Critical/Endangered	-	-	-	-	-

The threat to HCVFs was analysed based on the information source which provided the high value determination for the ecoregion. . For each category flagged as having an HCVF in the ecoregion, the HCVF was analysed as to whether the threat was from forest management, or not. Where the threat was not due to forest management, the overall risk was reduced to low, otherwise the risk was classified as unspecified and the ecoregion/HCVF was further evaluated for the level of protection in section 3.2, below.

Allegheny Highlands forests (NA0401)

Description of threats

Less than 1 percent of this ecoregion remains intact, but once logged areas are now reforested. Agriculture, particularly in the western and central lowlands, is the leading cause of habitat loss, while recreation and development contribute to habitat loss in the northern parts of the ecoregion.

Recreational and suburban developments pose a significant threat to the forests of the Allegheny Highlands, particularly in the Finger Lakes region and the Catskills. In the western portion of the ecoregion, a booming deer population is destroying herbaceous vegetation and preventing tree regeneration. (http://www.worldwildlife.org/).

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. NA0401 is not part of WWF's "Global 200 ecoregions" that require special consideration. The majority of the ecoregion has been heavily altered by human activity, particularly recreational suburban development and conversion to agriculture. There are some issues with the level of conservation in the ecoregion, but given the current legislative requirements regarding forest management activities (on managed forests) it is very unlikely that forest management activities (i.e., harvesting) contributes great threat to ecoregional HCVs. Management plan ensure that the remaining forests remain as working forests will likely go a long way to helping maintain existing HCVFs (limit or reverse forest conversion).

As such, the overall risk of threat to HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc.and forest management activities in the ecoregion NA0401 **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Appalachian Mixed Mesophytic Forests

(NA0402)

Description of threats

Over 95 percent of this habitat, perhaps more, has been converted or degraded at some point in the last 200 years. Only a few very small and scattered fragments of undisturbed or old-growth forests still remain, most less than a few hectares in size (Davis 1993). Forests were converted for agriculture, coal mining, logging for charcoal, dams, and road building.

Hardwood forests are increasingly being exploited throughout the region as maturing forests become attractive to timber exploiters and production in West Coast forests declines. Coal, copper, and ore mining in this ecoregion are a major cause of air and water pollution, causing widespread degradation and poisoning of ecosystems. Highways continue to cause high mortality in wildlife and are barriers to dispersal for many species. Numerous proposed highways, roads, and power lines cut across many of the larger blocks of forest in the ecoregion.

Most of the agricultural lands have subsequently failed and are being abandoned, with an increase in the growth of secondary, or pioneer, forests. Because of the intensity and broad extent of clearing of forests over the last two centuries, many forest-specialist species appear to have been extirpated over large portions of the landscape.

HCVF identified as threatened

WWF Conservation status

NA0402 is part of WWF's "Global 200 ecoregions" and assessed by WWF as having a conservation status of Critical/Endangered which means that this ecoregion require special consideration. A priority activity to enhance biodiversity conservation is actually implemented. Among this activities, there are:

- Identification and protection of large core areas of forest, linkage zones, and buffer zones, building upon existing protected sites
- Identification, restoration, and protection of large blocks of unfragmented forest habitat that can act as source pools for breeding migratory songbirds
- Implementation of plans to increase the connectivity of public and conserved private lands, particularly in Wayne State Forest and the Cumberland Plateau of Tennessee.
- Reduction and control of acid precipitation, gypsy moths, woolly adelgids, and zebra mussels.
- Control of poaching of black bears and other wildlife, and commercially harvested herbs.
- Reevaluation of fire suppression and management practices in light of maintaining native communities.
- Increase in heritage inventories of the ecoregion to identify additional areas and species populations in need of protection and conservation action.
- Development of hunting management plans that would prevent over-abundant deer populations from causing irreversible ecological damage.

- Considering the efforts to restore and protect wildlife and unfragmented forest habitats, the risk of threat for this category of HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc.and forest management activities in the ecoregion NA0402 **is low.** There are **no other ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Appalachian-Blue Ridge forests (NA0403)

Description of threats

Approximately 83 percent of the habitat in this ecoregion has been altered. Heaviest loss in habitat can be found in the ridge and valley provinces, particularly in limestone valleys that are most productive for agriculture. Habitat loss is greatest in low elevations, and diminishes with increased elevation. Lower elevations have milder slopes, and were preferentially selected for conversion to agriculture. In addition, suburban sprawl and urban development has occurred in the lower elevations. The vast majority of the region has been logged. Only a few blocks and patches of unlogged forest remain, with several larger blocks found in the Great Smokies region. Virtually all of Shenandoah National Park is regrowth, a situation repeated throughout the region where forests occur today. The spruce-fir forests and portions of the mixed oak forest were subject to intensive logging in the early 1900's. In the wake of poor management, heath balds spread over many ridge tops, thwarting plant and tree regeneration (White et al. 1993). Forests were also cleared for agriculture and pastures. However, these clearings have slowly been abandoned, and have subsequently begun to revert back to forest communities (Stephenson et al. 1993).

The major types of conversion threats for the ecoregion are timber and mineral extraction, conversion to developed lands, fire suppression, air pollution, acid precipitation, high densities of deer, and the introduction of exotic pests and diseases.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Vulnerable and NA0403 is not part of WWF's "Global 200 ecoregions" that require special consideration. There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) for this ecoregion according to independent verifiable information which mean a **low risk** of threat to HCVFs.

Central US Hardwood forests (NA0404)

Description of threats

Only about one percent of the Central U.S. Hardwoods remains as intact habitat. The majority of the ecoregion has been heavily altered by human activity, particularly conversion to agriculture, short rotation silviculture, and pasture in some areas (e.g., bluegrass).

Urban sprawl and agricultural conversion are the greatest conversion threats to the region. Invasion of exotic grasses, cave vandalism and overuse for recreation, fire suppression in fire-maintained systems, and loss of large ungulates (bison) are degrading the remaining natural habitats. Deer poaching continues to be a problem in Kentucky and Tennessee, and collection of wild herbs is ongoing across the region.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. NA0404 is not part of WWF's "Global 200 ecoregions" that require special consideration. The majority of the ecoregion has been heavily altered by human activity, particularly urban sprawl and conversion to agriculture. There are some issues with the level of conservation in the ecoregion, but given the current legislative requirements regarding forest management activities (on managed forests) it is very unlikely that forest management activities (i.e., harvesting) contributes great threat to ecoregional HCVs. Management plan ensure that the remaining forests remain as working forests will likely go a long way to helping maintain existing HCVFs (limit or reverse forest conversion).

As such, the overall risk of threat to HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc.and forest management activities in the ecoregion NA0404 **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Eastern forest-boreal transition (NA0406)

Description of threats

In the NA0406 ecoregion, the territory is very fragmented and heavily impacted by human activities since the arrival of Europeans in North America. It is estimated that only 10 percent of the ecoregion remains as intact habitat. Much of the area has been highly fragmented by forestry activities, settlements, summer homes and cottages, ski facilities and agriculture.

The timber industry continues to be very active in the ecoregion, particularly in the Canadian portion. There is increased mining potential throughout and tourism is beginning to create significant impacts in parts of the ecoregion.

HCVF identified as threatened)

WWF Conservation status

WWF ecoregion conservation status is Vulnerable and NA0406 is not part of WWF's "Global 200 ecoregions" that require special consideration which mean a low risk of threat to HCVFs.

Global Forest Watch Intact Forest

GFW have identified Significant Intact forest within the ecoregion. The intact forests are located in boreal area of the ecoregion and outside of the supply areas of 9293-8760 Québec Inc., dba Primewood Inc.. In addition, the mainly significant intact forests are located outside of forest tenures, ensuring that they are not threatened by forest management activities. Combined with the significant protected areas and regulations in place to manage for all forest values, it is reasonable to say that forest management activities do not threaten HCVFs.

Considering that WWF ecoregion conservation status is Vulnerable and the multiple levels of protection in place ensuring that Intact forests are maintained, the overall risk of threat for this category of HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc. and forest management activities in the ecoregion NA0406 **is low.**

Eastern Great Lakes lowland forests (NA0407)

Description of threats

In the NA0407 ecoregions, the territory is highly fragmented, with effectively no connectivity in most areas and little core habitat due to edge effects. Over 95 percent of the habitat in this ecoregion has been lost to suburban development and pollution of the St. Lawrence. Montreal (population greater than 2 million), Ottawa (population greater than 700,000) and Quebec City (population greater than 700,000) are some of the larger urban centres. Widespread farming occurs on much of the rest of the landscape (along with smaller manufacturing centres). Principal crops are corn, grains, soybeans and apple orchards. Much of the remaining habitat consists of wetlands or abandoned farmlands undergoing reforestation. In some locations, recovery of abandoned agricultural land is beginning to occur, but these lands remain unprotected.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. NA0407 is not part of WWF's "Global 200 ecoregions" that require special consideration. The majority of the ecoregion has been heavily altered by human activity, particularly suburban development and conversion to agriculture. There are some issues with the level of conservation in the ecoregion, but given the current legislative requirements regarding forest management activities (on managed forests) it is very unlikely that forest management activities (i.e., harvesting) contributes great threat to ecoregional HCVs. Management plan ensure that the remaining forests remain as working forests will likely go a long way to helping maintain existing HCVFs (limit or reverse forest conversion).

As such, the overall risk of threat to HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc.and forest management activities in the ecoregion NA0407 **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Mississippi lowland forests (NA0409)

Description of threats

The Mississippi Lowland Forests serve as an important part of a major flyway route used by migratory birds. The rich bottomland forests once contained some of the most interesting hardwood communities in the United States but these are virtually all cleared.

About 91-95 percent of this habitat has now been converted to agriculture or other uses, or is highly degraded. Soybean cultivation dominates land use. The habitats most affected are bottomland forests, which were cleared for agriculture or harvested for timber long ago.

Because of the highdegree of conversion, there is little left to conserve. Hydrologic alterations have the greatest impact. Logging remains a threat, as does continued exploitation of remaining forests. Pollutant effects in the lower section of the ecoregion are serious.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. The Ecoregion NA0409 is not part of WWF's "Global 200 ecoregions" that require special consideration. The WWF Terrestrial Ecoregion Profile state that there is approximately only 1 % of the ecoregion remaining intact habitat. About 91-95 percent of this habitat has now been converted to agriculture or other uses, or is highly degraded. Soybean cultivation dominates land use. The habitats most affected are bottomland forests, which were cleared for agriculture or harvested for timber long ago. Because of the highdegree of conversion, there is little left to conserve. This ecoregion has been greatly affected by fragmentation, levee construction, and the alteration of river flow. The long-term potential of corridor restoration is low. Hydrologic alterations have the greatest impact. Logging remains a threat, as does continued exploitation of remaining forests. Pollutant effects in the lower section of the ecoregion are serious.

Remaining habitat is confined to the wettest sites, which are difficult to exploit economically or put under cultivation. The remaining blocks are not representative of the ecoregion's major habitats. Remaining fragments include:

- Atchafalaya Area and surrounding lowlands (status/ownership uncertain) - southern Louisiana
- Crowley's Ridge (partly included in St. Francis National Forest) - northeastern Arkansas, southeastern Missouri
- Big Woods Conservation Area adjacent to USFWS refuge (TNC) - northern Louisiana
- Cache River Restoration Project - southern Illinois, southeastern Missouri, southwestern Kentucky
- Mingo NWR - southeastern Missouri
- several National Wildlife Refuges of uncertain biodiversity value

Degree of Fragmentation

There is no possibility at present of connecting the existing blocks mentioned above.

Considering the efforts to restore wildlife and riparian habitats and to protect the middle and remaining forests, the risk of threat for this category of HCVFs from the forest management activities in the ecoregion NA0409 **is low.**

New England-Acadian forests (NA0410)

Description of threats

Now increasingly forested, parts of the landscape in this ecoregion have changed dramatically over the past 350 years. By the middle of the 19th century farm crops or pastures covered nearly three-quarters of the arable land in southern and central New England.

Little intact habitat remains in this ecoregion, with only about 5 percent of the New England Acadian forest in presettlement condition. The major conversion and degradation threats to this ecoregion are development and logging. Development for second homes and ecotourism is a particular problem in Quebec and in the vicinity of other urban centres. High-intensity recreational development (e.g. ski hills) and mining (esp. in Quebec) combine to further reduce the remaining extent of natural habitat in this ecoregion.

Mining is a major land use in parts of the ecoregion in Quebec (Talc, Marble, Asbestos, Granite) and interest remains high for the extensive Serpentine areas of Quebec.

HCVF identified as threatened

WWF Conservation status
WWF ecoregion conservation status is Critical/Endangered. NA0410 is not part of WWF's "Global 200 ecoregions" that require special consideration. There are some issues with the level of conservation in the ecoregion, but given the current legislative requirements regarding forest management activities (on managed forests) it is very unlikely that forest management activities (i.e., harvesting) contributes great threat to ecoregional HCVs. Ensuring that the remaining forests remain as working forests will likely go a long way to helping maintain existing HCVFs (limit or reverse forest conversion).

Serpentine Flora
Serpentine Flora may be found in the New-England-Acadian forests ecoregion (NA0410). The Serpentine-de-Coleraine Ecological Reserve represents one of the rare areas in Quebec where serpentine is found. http://www.mddep.gouv.qc.ca/biodiversite/reserves/serpentine_coleraine/res_67.htm.

This area is protected under the *Regulation respecting threatened or vulnerable plant species and their habitats*, which protects the "Éboulis-de-Serpentine-du-Mont-Caribou" plant habitat. The habitat corresponds to an escarpment and talus on the eastern flank of Mont Caribou, within the Serpentine-de-Coleraine ecological reserve, in the territory of Municipalité de Saint-Joseph-de-Coleraine, Municipalité régionale de comté de l'Amiante. The habitat is identified on a chart prepared by the Ministry. Furthermore, there is no threat from forest management activities, as Serpentine Flora ecosystems do not include or support commercial forest (due to rock/ soil type).

As such, the overall risk of threat to HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc. and forest management activities in the ecoregion NA0410 **is low.** There are **no other ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Northeastern coastal forests (NA0411)

Description of threats

Suburban sprawl has resulted in the loss of over 98 percent of the ecoregion's natural habitat. Remaining habitat is limited to fragments and degraded larger patches. The northeastern forests were the first on the continent to suffer from heavy logging pressure, and they may again come under the ax as loggers revisit the northeast, for the fourth or fifth time, as western forests are depleted.

Development is the greatest threat and could significantly alter at least 25 percent of the remaining habitat within the next 20 years. Native plants are experiencing significant mortality due to shoreline erosion, the introduction of exotics, and overuse of natural resources. Collection of wild orchids and reptiles poses a threat to some species and the recreational use of fragile shoreline constitutes a major threat to the wildlife of this ecoregion.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. NA0411 is not part of WWF's "Global 200 ecoregions" that require special consideration. The majority of the ecoregion has been heavily altered by human activity, particularly urban and suburban development. There are some issues with the level of conservation in the ecoregion, but given the current legislative requirements regarding forest management activities (on managed forests) it is very unlikely that forest management activities (i.e., harvesting) contributes great threat to ecoregional HCVs. Management plan ensure that the remaining forests remain as working forests will likely go a long way to helping maintain existing HCVFs (limit or reverse forest conversion).

As such, the overall risk of threat to HCVFs from the supply's area of 9293-8760 Québec Inc., dba Primewood Inc.and forest management activities in the ecoregion NA0411 **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Southeastern mixed forests (NA0413)

Description of threats

About 99 percent of this habitat has now been converted to agriculture or other uses, or is highly degraded. Habitat loss is relatively uniform across the ecoregion. This is the most heavily settled ecoregion along the east coast of the U.S., and much of the land has been used for growing tobacco and peanuts. The once dense forests harvested long ago have never been allowed to regrow to a mature age. There are large amounts of tertiary forests that offer little biodiversity value. A remnant tallgrass prairie, the so-called Black Belt, has been completely converted. A few habitats are in relatively good condition, particularly on granite outcrops.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. NA0413 is not part of WWF's "Global 200 ecoregions" that require special consideration. The majority of the ecoregion has been heavily altered by human activity, particularly by conversion to agriculture.

Nine blocks of habitat have been identified by this analysis, but most are in relatively poor condition, fragmented, and poorly protected. These include:

- Sumter National Forest (in very poor shape) - western South Carolina
- Uwharrie National Forest - central North Carolina
- Bienville National Forest - east central Mississippi
- Talladega National Forest (SW unit) - central Alabama
- Oconee National Forest and Piedmont National Wildlife Refuge - north central Georgia
- Brushy Mountains - central North Carolina
- South Mountains - south central North Carolina
- Tunica Hills - southwestern Mississippi, eastern Louisiana

Fragmentation is very high and creation of new corridors is unlikely except in riparian areas. The species most susceptible to fragmentation, such as black bears (Ursus americanus), have been largely extirpated.
Because of the heavy rate of conversion, there is little left to conserve. Logging remains a threat, as does continued exploitation of remaining forests, and conversion to pine plantations. The lack of fire management in remaining areas is viewed as a serious degradation threat. There are some issues with the level of conservation in the ecoregion, but given the current legislative requirements regarding forest management activities (on managed forests) it is very unlikely that forest management activities (i.e., harvesting) contributes great threat to ecoregional HCVs. Management plan ensure that the remaining forests remain as working forests will likely go a long way to helping maintain existing HCVFs (limit or reverse forest conversion).

As such, the overall risk of HCVFs from forest management activities **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Southern Great Lakes forests (NA0414)

Description of threats

Agriculture and industrial and urban development are the predominant land uses in much of this ecoregion. Thus, the ecoregion is one of the most heavily impacted by human activities on the continent. Habitat loss is nearly complete in this ecoregion. Nearly 100 percent of the region was ranked as heavily altered. Wetland losses have been particularly severe; Ohio, for example, has lost 90 percent of its wetlands, and 80 percent of the southern tamarack swamp in Michigan has been destroyed (Noss and Peter 1995). Major urbans centers include: Toronto, Hamilton, Buffalo, Rochester, Syracuse, Detroit-Windsor, Erie, Cleveland, Cincinnati, Columbus, and Indianapolis.

The remaining tiny fragments of natural habitat in the Southern Great Lakes face intense conversion pressure from development and agricultural expansion. Agricultural conversion for corn, soybeans, tobacco, grains, canola, and tender fruit has occurred. Urban sprawl threatens this region. Agricultural land and woodlots are being severed to accommodate country homes. Habitat not being converted is being degraded by pollution and exotic species. Wildlife exploitation continues and the elimination of most target species is imminent or complete.

HCVF identified as threatened

WWF Conservation status

WWF ecoregion conservation status is Critical/Endangered. NA0414 is not part of WWF's "Global 200 ecoregions" that require special consideration. This ecoregion covers much of the industrial heartland of North America, including southern Michigan, much of Ohio and Indiana, extreme southwestern Ontario, including the lowlands of the south of Lake Ontario in Ontario and western New York State. Very little of this ecoregion is located within Canada. The area is so heavily populated and developed that essentially no large blocks of natural habitat remains. Agriculture and industrial and urban development are the predominant land uses in much of this ecoregion. Thus, the ecoregion is one of the most heavily impacted by human activities on the continent.

Within Ontario, this ecoregjon is found in the most densely populated area (this area includes the city of Toronto, London and Windsor and other urban areas, as well as very significant amounts of agricultural lands). Fiber source areas however would not be from urbanized or agricultural sections of the ecoregion. Forestry is not listed as a concern/ threat.

Since the ecoregion generally lacks commercial forest lands or managed forests it is very unlikely that forest management activities (i.e., harvesting) contributes conversion, forest loss or impacts high conservation value forests.

As such, the overall risk of HCVFs from forest management activities **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Middle Atlantic coastal forests (NA0517)

Description of threats

One of the greatest threats is to the diverse wetlands communities and in particular bottomland forests. These were once extensive: in the mid-1970s, 47 percent (188,000 km2) of remaining wetlands in the lower 48 states of the U.S. were in the southeast. Sixty-five percent of the pallustrine forested wetlands (pocosins, swamps, bottomland hardwoods, and bogs) in the United States occur in the Southeast (Hefner and Brown 1984). Pocosins originally covered 9,080 km2 of the 41 Coastal Plain counties of North Carolina. By 1979 6,080 km2 of natural or slightly altered pocosins remained. Of this amount only 2,810 km2 were still considered in a natural state as of 1980 (Richardson and Gibbons 1993). The number of Carolina Bays in uncertain, although at least 6,000 once occured in North and South Carolina. Few natural bays remain, the majority having already been modified by agricultural or urban development. The South Carolina Trust Program provides details on the numbers and proportions of altered and natural bays (Bennet and Nelson 1989). The least affected communities in this ecoregion are the coastal marshes and deep peatlands.

The main reasons behind conversion are agriculture, fire suppression, urbanization, coastal development (including resorts), ditching and draining of wetlands, and damming of rivers which affect hydrology.

HCVF identified as threatened

WWF Conservation status

WF ecoregion conservation status is Critical/Endangered. NA0517 is not part of WWF's "Global 200 ecoregions" that require special consideration. Approximately 12 percent of the ecoregion contains habitat that meets the definition of intact used in this assessment. The highest levels of conversion are in the western part of this ecoregion, the upper coastal plain, where upland vegetation on loamy soils has been nearly completely converted. Long-leaf pine communities have largely disappeared, and are now absent in Virginia. Much of the cypress forests of the Middle Atlantic Coastal Forests has been lost to logging (Christensen 1988). Stands where cypress has been high-graded often revert to bay forests. Where logging and fire have occurred, cypress is extremely slow to recover. The Great Dismal swamp in Virginia was one of the strongholds of Atlantic White Cedar swamps and is now virtually gone (Noss and Peters 1995).

There are numerous blocks of habitat scattered about the ecoregion, but all are relatively small in size. Those that include at least a fraction of intact habitat are:

- Savannah River bottomlands - southern South Carolina/Georgia border
- C.E. basin - southern South Carolina
- Francis Marion National Forest - eastern South Carolina
- Winyah Bay - eastern South Carolina
- Lake Waccamaw and River - southeastern North Carolina, northeastern South Carolina
- Brunswick County Pinelands - southeastern North Carolina
- Bladen Lakes - southern North Carolina
- Holly Shelter Gamelands - southeastern North Carolina
- Camp Lejeune - southeastern North Carolina
- Croatan National Forest - eastern North Carolina
- Outer Banks - coastal North Carolina

- Pamlimarle Peninsula - eastern North Carolina
- Roanoke River - eastern North Carolina

Fragmentation is an important threat in this ecoregion because it exacerbates the main problem of fire suppression. An area where much work remains to be done is in planning and creating corridors along the coast. In the uplands, a corridor between Fort Bragg and the Sandhills gamelands represents the only possibility at present for linking upland areas. Other opportunities for establishing corridors include links among the Croatan National Forest, Camp Lejeune, and the Holly Shelter Gamelands. Another possibility is among the Brunswick County Pinelands, and Lake Waccamaw.

This ecoregion contains the longest undammed river sections in the country. However,there is very poor protection of blackwater bottomlands. Forested wetlands, such as bottomlands forests, are undergoing rapid reduction in area and alteration of composition. Many are being converted to farmland, used for industrial parks, or modified by urban and suburban expansion. Other forested wetlands are being managed for timber production which typically reduced their value as wildlife habitat for sensitive species (Sharitz and Mitsch 1993). North Carolina and South Carolina were estimated at having 12,950 km2 and 12,790 km2, respectively of bottomland hardwood forest in 1952. Projections for the year 2000 show a loss of 20 percent in North Carolina and 28 percent in South Carolina bottomland hardwood forests.

Since the ecoregion generally lacks commercial forest lands or managed forests it is very unlikely that forest management activities (i.e., harvesting) contributes conversion, forest loss or impacts high conservation value forests.

As such, the overall risk of HCVFs from forest management activities **is low.** There is **no ecoregionally significant high conservation values** (e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact Forest Landscapes) in the district of origin according to independent verifiable information at the ecoregion level.

Sources of information

- FSC documentation on HCVs (ic.fsc.org)
- Ecoregion definition and information www.worldwildlife.org/biomes
- Global 200 Ecoregion www.worldwildlife.org/science/wildfinder
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/
- Conservation International's Biodiversity Hotspot http://www.conservation.org/Pages/default.aspx
- Biodiversity Hotspot map http://www.biodiversitya-z.org/content/biodiversity-hotspots
- Conservation Union (IUCN) as a *Centre of Plant Diversity* http://www.biodiversitya-z.org/content/centres-of-plant-diversity-cpd
- *Centre of Plant Diversity map* http://www.arcgis.com/home/item.html?id=29673486d08b41a2bea0a3e19d5c573e
- High Biodiversity Wilderness Area http://www.biodiversitya-z.org/content/high-biodiversity-wilderness-areas-hbwa
- World Resources Institute *Frontier Forest* http://pdf.wri.org/lastfrontierforests.pdf
- Intact Forests Landscapes, www.intactforests.org http://www.globalforestwatch.org/
- Protected area of USA http://www.biodiversitya-z.org/content/united-states-of-america
- Intact Forests Landscapes, www.intactforests.org; http://www.globalforestwatch.org/
- IFL used for the National Risk Assessment for Canada https://ca.fsc.org/preview.hcv2-ifl-risk-canada.a-2033.jpg

- Protected area of Canada http://www.biodiversitya-z.org/content/canada
- Federal Species at Risk Act – Woodland Caribou Recovery Strategies (for boreal and southern mountain populations) http://www.sararegistry.gc.ca/document/default_e.cfm?documentID=2253 and http://www.sararegistry.gc.ca/document
- https://www.mern.gouv.qc.ca/publications/gaspesie-iles-de-la-madeleine/plan-amenagement-caribou-gaspesie-2013-2018.pdf.
- Advice 20-007-018 V1-0 (Advice Note for the interpretation of the default clause of Motion 65) regarding Intact Forest Landscape (IFL) https://ca.fsc.org/preview.advice-note-on-the-development-of-indicators-for-the-protection-of-ifls-icls.a-1361.pdf
- National Risk Assessment for Canada: Draft 1 open for public consultation https://ca.fsc.org/en-ca/standards/national-risk-assessment-01
- Map of IntactLandscapes overlap with 2017 CrownAOP
- Map of IntactLandscapes overlap with 2018CrownAOP
- Details of the areas harvested in IFL (Risk Assessment 2017 Section 3 hectares)
-

Risk Assessment designation

The overall risk of HCVFs from forest management activities **is low**.

3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.

Indicator 3.1 is met for ecoregion **NA0401, NA0402, NA0403, NA0404, NA0406, NA0407, NA0409, NA0410, NA0411, NA0413, NA0414, NA0517** There are no ecoregionally significant high conservation values in the district of origin according to independent verifiable information at the ecoregion level. **Low risk.**

Sources of information

- I Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/
- FSC documentation on HCVs (ic.fsc.org)
- Ecoregion definition and information www.worldwildlife.org/biomes
- Global 200 Ecoregion www.worldwildlife.org/science/wildfinder
- Conservation International's Biodiversity Hotspot http://www.conservation.org/Pages/default.aspx
- Biodiversity Hotspot map http://www.biodiversitya-z.org/content/biodiversity-hotspots
- Conservation Union (IUCN) as a *Centre of Plant Diversity* http://www.biodiversitya-z.org/content/centres-of-plant-diversity-cpd
- *Centre of Plant Diversity map* http://www.arcgis.com/home/item.html?id=29673486d08b41a2bea0a3e19d5c573e
- High Biodiversity Wilderness Area http://www.biodiversitya-z.org/content/high-biodiversity-wilderness-areas-hbwa
- World Resources Institute *Frontier Forest* http://pdf.wri.org/lastfrontierforests.pdf
- Intact Forests Landscapes, www.intactforests.org http://www.globalforestwatch.org/
- http://www.biodiversitya-z.org/areas/11
- US Department of Agriculture: www.usda.gov

National/regional stakeholders support

N.A, Low Risk

Risk Assessment designation:

The overall risk of HCVFs from forest management activities **is low**.

4 WOOD HARVESTED FROM AREAS BEING CONVERTED FROM FORESTS AND OTHER WOODED ECOSYSTEMS TO PLANTATIONS OR NON-FOREST USES

4.1 The supply area may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is met:

a) There is no commercial use of genetically modified trees of the species being sourced; or

b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use of the species being sourced; or

c) It is forbidden to use genetically modified trees commercially in the country concerned.

In United States since the beginning of the 20th century, the forests surface area is at approximately 300 million hectares (ref: State of Americas forests; Society of American Forester, 2007). They have been at that level for the past 100 years.

According to the 2012 "State of the World's Forests" report from the FAO, change in forest cover in the U.S. between 1990 and 2010 was positive, adding 0.1% per year. At a national level, the U.S. can be considered low risk for obtaining wood from conversion.

Furthermore, the cutting carried out for urban development is under the jurisdiction of municipalities and states. And according to the USDA, we note no major variation in the forest areas of this region's states.

A study for the American Hardwood Export Council (AHEC) found that in the hardwood regions of the United States, all but two areas maintained forest cover with losses less than the 0.5% per year threshold. The two exceptions were the Pacific Lowlands Mixed Forests (comprising the Puget Lowlands Forests and the Willamette Valley Forests) and the Florida Everglades, areas experiencing population growth, development, and agricultural expansion, conversion drivers that are independent of forest harvesting. These exceptions are not supply territories of the organisation.

Sources of information

- FAO. 2011. "State of the World's Forests: North America." Rome. Available at: http://www.fao.org/docrep/011/i0350e/i0350e00.htm
- FAO GOFC-GOLD Global Observation of Forest and Land Cover Dynamics
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/
- FAO Global Forest Resources Assessment www.fao.org/forestry
- Conservation International Regional Analysis Program
- UNEP/GRID – Division of Early Warning and Assessment
- SERVIR – Regional Monitoring and Visualization System for Mesoamerica
- CEC Joint Research Centre
- FSC National Initiatives and Regional Offices contacts: www.fsc.org
- Land Cover Change in the Eastern United States http://landcovertrends.usgs.gov/east/regionalSummary.html

USDA http://www.fia.fs.fed.us/tools-data

Risk Assessment designation

Low risk

5 WOOD FROM FORESTS IN WHICH GENETICALLY MODIFIED TREES ARE PLANTED

5.1 The supply area may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is met:

a) There is no commercial use of genetically modified trees of the species being sourced; or

b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use of the species being sourced; or

c) It is forbidden to use genetically modified trees commercially in the country concerned.

There is no additional known information, and the FSC National Office has not provided any additional information, that contradicts the assessment results provide by the **Centralized National Risk Assessment for USA**. Therefore, the source area can be considered Low risk

Sources of information

- FSC-CNRA-USA V1-0 EN, section 5
- Registre FSC « Global Forest Registry» http://www.globalforestregistry.org/NEW/map/

Risk Assessment designation

Low risk

End of report