

Does GP North Woods LP meet FSC's Controlled Wood standard?

October 18, 2023

We are carrying out an audit of GP North Woods LP located in Englehart, 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 October 31, 2023. 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 at (416) 882-5576
 - Writing to Angus McAuslan at
P.O. Box 1771
Chelsea, QC J9B 1A1
Canada.
 - 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.

GP North Woods LP 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 <https://preferredbynature.org/dispute-resolution-policy>

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
Operations Specialist

FSC Controlled Wood Due Diligence System Public Summary

Note: Guidance on how to use this document is in grey italic font and should be deleted from the final version

1. General information

Organisation name:	GP North Woods LP
FSC certificate code:	NC-COC-003769, NC-CW-003769
Organisation’s DDS contact person:	Tammy Mazzetti 705-544-6153
DDS prepared/assisted by:	<i>Tammy Mazzetti, Bobby Maddrey</i>
Date last reviewed/updated (by the organisation):	November 22 2022

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
<i>Name of organisation’s site. All applicable sites shall be included.</i>	<i>Describe the type of product supplied e.g. logs, sawn logs, chips, wood pulp, etc.</i>	<i>Number of suppliers directly supplying material to the site</i>	<i>E.g. Forest management enterprise, Broker/trader without physical possession, Primary processor, Secondary processor, Distributor/wholesaler.</i>	<i>Average number of organisations within the supply chains, from forest to suppliers.</i>	<i>Total number of organisations that are sub-suppliers (indirect suppliers, or suppliers of your direct suppliers) within all supply chains</i>
GP North Woods Englehart	Logs	13 Controlled Wood suppliers for the 2022 audit period	Primary Processor	1	0
GP North Woods – Earlton	OSB Finished Product	1	Distribution	1	0

3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
<i>The description should allow the identification of an area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category. This is a geographic description (including country of origin) and may also include a functional scale/source type, where the risk assessment differentiates risk based on characteristics such as type of forest (e.g. natural forest or plantation), ownership (e.g. state or private-owned), etc.</i>		<i>If an NRA or CNRA is used, include the document title on FSC Document Centre. E.g. the title for the CNRA for Poland is “FSC-CNRA-PL V1-1” (see https://ic.fsc.org/en/document-center/id/238). If a company risk assessment or extended company risk assessment is used, write this and refer to the Annex containing the risk assessment.</i>	<i>Select the relevant risk designation for the supply area and controlled wood category from the drop-down menu.</i>
Northcentral, Northeastern (including Abitibi River Forest) and Southcentral Ontario, Northwestern Abitibi Temiscaminque Quebec	1	FSC National Risk Assessment for Canada	Low risk
	2	FSC National Risk Assessment for Canada	Specified risk
	3	FSC National Risk Assessment for Canada	Specified risk
	4	FSC National Risk Assessment for Canada	Low risk
	5	FSC National Risk Assessment for Canada	Low risk
	1		Choose an item.
	2		Choose an item.
	3		Choose an item.
	4		Choose an item.
	5		Choose an item.
	1		Choose an item.
	2		Choose an item.
	3		Choose an item.
	4		Choose an item.
	5		Choose an item.

4. Risk assessment and mitigation

4.a Risk mitigation for the origin of the material

Copy the table for each supply area. Add information about control measures for each indicator that is designated **specified or unspecified risk** in the relevant risk assessment (**deleting rows for indicators that are low risk or aren't found in the applicable risk assessment**) and complete the table.

If you only source from low risk areas, delete the table and state **“N/A, all supply areas are low risk”**.

Supply area:		
Indicator	Control Measures	Findings from field verification if undertaken as a control measure
<i>Number of the indicators designated specified or unspecified risk in the applicable risk assessment. Note that</i>	<i>Describe the control measures implemented to mitigate the risk and describe their desired outcome. Describe the activities conducted to verify the effectiveness of the control measures. Include information on the cycle (how often you conduct verification), number of audits, justification of sampling intensity, and the key results of the audits. If you found non-conformities, state steps taken to address them.</i>	<i>Summarise findings, if field verification was conducted. Describe steps taken to address any non-conformities found, unless confidential. If information is deemed confidential and not published, provide a justification for this.</i>

<p><i>the number of applicable indicators will change depending on the type of risk assessment used, and not all will be applicable to company risk assessments and 'old' national risk assessments.</i></p>		
<p>Controlled wood category 2. Wood harvested in violation of traditional and human rights</p>		
<p>2.1</p>		
<p>2.2</p>		
<p>2.3</p>	<p><i>GP Meets Control Measure 1 therefore Low Risk</i></p> <p><i>Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan</i></p> <p><i>Currently, there has been no opposition to the FM Plans for non-FSC certified forest within GP's supply area by Indigenous People. If the applicable Forest Management Plan for a non-FSC certified forest within GP supply area is opposed by Indigenous Peoples, as per the definition above, GP will work to apply one of the other recommended control measures</i></p>	<p>N/A</p>
<p>2.4</p>		
<p>2.5</p>		
<p>Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities</p>		
<p>3.1</p>	<p><i>Control Measure 3.1.4</i></p> <p><i>Specified Risk for concentrations of SAR Critical Habitat for Woodland caribou within GP Ontario's identified supply area overlaps with small private land holdings as identified by SARA.</i></p> <p><i>Caribou Management on Private Land provides comprehensive information provided to land managers that demonstrates</i></p> <ul style="list-style-type: none"> • <i>Critical habitat</i> • <i>Threats to critical habitat</i> • <i>Best management practices to reduce threats to critical habitat</i> • <i>Applicable legislation.</i> <p><i>Information available upon request.</i></p>	<p>N/A</p>
<p>3.2</p>	<p><i>Forest operations do not reduce an IFL below 50,000 ha, AND all meet applicable options below, therefore low risk:</i></p> <ul style="list-style-type: none"> 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> b) <i>B) For an IFL between 625012 and 75000 ha, cumulative impacts forest operations do not affect more than 20% of the IFL.</i> 	<p>N/A</p>

	<p>c) For an IFL between 75001 and 200,000 ha, cumulative impacts forest operations do not affect more than 30% of the IFL.</p> <p>d) For an IFL between 200,001 and 500,000 ha, cumulative impacts forest operations do not affect more than 35% of the IFL.</p> <p>e) For an IFL larger than 500,001 ha, cumulative impacts forest operations do not affect more than 456% of the IFL.</p> <p>Refer to the "IFL Analysis Package – EACOM Ontario" document (available upon request) for a detailed description of the IFL analysis and results conducted on these FMU's. EACOM updates this analysis on an annual basis and shares with GP. If the control measure cannot be met in future annual updates, GP will assess whether one of the other control measures can be met, or else not source wood from the specific IFL.</p>	
3.3		
3.4		
3.5		
3.6		

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
<i>This table shall be filled for each applicable participating site (listed in the table in Section 2)</i>	<p>Describe the supply chain e.g.</p> <ul style="list-style-type: none"> Wood delivered and purchased directly from concession holder to Organisation's log yard Wood delivered and purchased directly from concession holder to Organisation's log yard, but purchased through a round wood trader. Wood delivered from forest to railway terminal and transported by train to organisation. <p>and state the relevant supply area, or state that the material previously had an FSC claim but was sourced from a non-FSC certified (chain of custody) supply chain.</p>	<p>'Tiers' indicates the legal entities taking ownership of the wood from harvesting to the organisation purchasing it. If there is only 1 tier, it means that wood is purchased directly from the concession holder.</p>	<p>Summarise the risk assessment of mixing in this supply chain. Justify conclusions.</p> <p>NOTE: As per requirement 3.5 of FSC-STD-40-005 V3-1, material can only be used as controlled wood when there is low risk for origin and NO RISK of mixing with non-eligible inputs in the supply chains. Therefore, conclusions shall be either "no risk" or that risk is present. Control measures are required for instances where risk is present.</p>	<p>If risk is identified, state what actions are being taken to mitigate that risk. Describe the activities that have been conducted by the organisation to verify the effectiveness of the control measures. Include information on the cycle (how often verification is conducted), number of audits, justification of sampling intensity, and the key results of the audits. If non-conformities were found, state steps taken to address them.</p>	<p>Summarise findings, if field verification was conducted. Describe steps taken to address any non-conformities found, unless confidential. If information is deemed confidential and not published, provide a justification for this.</p>
Englehart	Logs purchased and delivered directly from the supplier to log yad.	1 tier	<p>No Risk of Mixing</p> <p>1) Movement of Crown forest resources must</p>		

			<p><i>be authorized by the MNRF in an approved Forest Management Plan.</i></p> <p><i>2) Bills of Lading, indicating origin, approval number, and load specifications must accompany all loads from origin to the mill. These BOL's reference an approved Purchase Order.</i></p> <p><i>3) MNR conducts periodic audits to verify the origin of all wood</i></p> <p><i>4) GP conducts daily audits of loads received to validate information on BOL references approved Purchase Orders</i></p> <p><i>5) Records of both Crown and private forest resources harvested are kept and made available for audit by MNR when requested.</i></p> <p><i>6) GP is Agent of the Crown and sends all Crown load information digitally to the MNRF monthly along with stumpage payment.</i></p>		
<i>Earlton</i>	<i>OSB</i>	<i>1</i>	<i>No Risk of Mixing GP – Englehart (and only Englehart) transfers OSB to Earlton for storage purposes.</i>		

			Each load of OSB from Englehart has tracking information i.e. BOL, trip ticket etc. and the OneLisa database is used by both sites		

5. Technical experts used in the development of control measures

List all technical experts used for developing control measures.

If none were required or used, delete table and write “**N/A, technical experts were not required**”.

Name	License/Registration #	Qualification	Scope of service	Source of information
			State the relevant supply area(s) and indicator(s) for which expertise was used in the development of control measures	For publicly available expertise, provide the citation for the specific source(s) of information used
N/A non used				

6. Stakeholder consultation processes

Summarise all stakeholder consultation processes that you have conducted, including information on:

If no stakeholder consultation processes were required or used, state “**N/A, stakeholder consultation not required**”

Supply area	Relevant controlled wood category	List of stakeholder groups invited to participate	Summary of comments received from stakeholders	Description of how stakeholder comments were taken into account	Justification for concluding that the material sourced from the area was low risk
		List all types of stakeholders contacted. E.g. Forest owners/managers, Forest contractors, Representatives of forest workers and forest industries, FSC certificate holders, Local/regional/national/international social NGOs, Forest workers, trade unions, local communities, indigenous and traditional peoples, local/regional/national/international environmental NGOs, FSC-accredited certification bodies, National and state forest agencies, Experts with expertise in controlled wood categories, Research			

		<i>institutions and universities, FSC regional offices/network partners/working groups</i>			
		<i>N/A no stakeholder consultation used</i>			

7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact [GP North Woods LP, tammy.mazzetti@gapac.com] 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.

Managing Stakeholder Complaints

The IRT Standard & WFS Forestry Examples to the Investigation, Reporting, and Tracking (IRT) System will be used as guidance

If a complaint is received regarding GP North Woods FSC Chain of Custody system and the controlled wood due diligence system the following actions will be taken

- All complaints regarding FSC items received by any GP North Woods company personnel will be forwarded to the Manager Sustainable Forestry and Compliance and the Director Global Sustainable Forestry for review
- The complainant will receive acknowledgement of complaint from designated GP personnel advising them of the complaint procedure.
- A preliminary assessment and investigation of the evidence provided in the complaint will be conducted within 2 weeks of the complaint. Complainant will receive an initial response within 2 weeks.
- Will conduct a preliminary assessment to determine whether evidence provided is or is not substantial by assessing it against the risk of using material from unacceptable sources.
- Communicate with complainants to try and resolve issues prior to further action.
- Conduct field verification for cases in which the evidence is substantial will be conducted within 2 months after receipt of the complaint.
- A TRAX system incident report will be completed documenting description of the complaint and the corrective action taken.
- While a complaint is being investigated, depending on the nature of the complaint, it will be determined whether to receive wood during investigation.
- If corrected action has not been completed, the supplier may be removed from approved suppliers list.
- Organization will evaluate the effectiveness of corrective action
- The Manager Sustainable Forestry and Compliance will notify the relevant FSC National Initiative or FSC Regional Office and the relevant FSC accredited Certification Body when there is a complaint, proposed corrective action and next steps or stakeholder feedback relevant to FSC risk designation. Substantial complaints will be forwarded within 2 weeks of receipt.

- Manager of Sustainable Forestry will record and file complaints received and corrective action taken in the TRAX system.

Annex

Include all company risk assessments and extended company risk assessments as annexes or refer to file name if attached separately.