

Does Murray Bros Lumber Company Limited meet FSC's Controlled Wood standard?

April 15, 2024

We are carrying out an audit of Murray Bros Lumber Company Limited located in Madawaska, 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 May 22, 2024. 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 James Hallworth at 249-358-9844
Writing to James Hallworth at
P.O. Box 1771
Chelsea, QC J9B 1A1
Canada.
 - Email to James Hallworth at jhallworth@preferredbynature.org
 - In person by arranging to meet with James Hallworth
- 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.

Murray Bros Lumber Company Limited 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

Appendix <Enter appendix code>: Description of the Due Diligence System, including information provided by the organisation according to FSC-STD-40-005 V3-1, Section 6

1. General information

Organisation name:	Murray Bros Lumber Company Ltd
FSC certificate code:	NC-COC-004156
Organisation's DDS contact person:	Gaelen Murray
DDS prepared/assisted by:	<i>Gaelen Murray</i>
Date last reviewed/updated (by the organisation):	April 15th 2024

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>Murray Brothers Lumber Company Ltd</i>	<i>Logs</i>	<i>38</i>	<i>Forest management enterpriser, primary processors</i>	<i>1</i>	<i>0</i>

3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
<p><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></p>		<p><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).</i></p> <p><i>If a company risk assessment or extended company risk assessment is used, write this and refer to the Annex containing the risk assessment.</i></p>	<p><i>Select the relevant risk designation for the supply area and controlled wood category from the drop-down menu.</i></p>
<p>Eastern Forest – Boreal Transition Ontario, Canada Ecoregion NA406 Specifically Geographic Townships Murchison-Dickens-Lyell-Sabine-Niven-Dickson-Preston-Sproule Clancy-Guthrie-Airy-Burns-Richards-Fraser-Hagarty-Richards-Jones-Sherwood-Brudenell-Radcliffe-Bangor-Lyndoch-Griffith-Mattawatchan-Brougham-Lavant-Bagot-Wicklow-McClure-Carlow-Monteagle-Herschel-Cardiff-Mayo-Fitzgerald-Stratton-Dalhousie- Wilberforce</p>	1	FSC-NRA-CAV2-1(https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment)	Low Risk
	2	FSC-NRA-CAV2-1(https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment)	Specified Risk 2.3
	3	FSC-NRA-CAV2-1(https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment)	Specified Risk 3.1, Low Risk for specified Townships
	4	FSC-NRA-CAV2-1(https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment)	Low Risk
	5	FSC-NRA-CAV2-1(https://ca.fsc.org/ca-en/controlled-wood/national-risk-assessment)	Low Risk

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: Eastern-Boreal Forest Transition Ontario, Canada Ecoregion NA406		
Indicator	Control Measures	Findings from field verification if undertaken as a control measure
<p><i>Number of the indicators designated specified or unspecified risk in the applicable risk assessment. Note that the number of applicable indicators will change depending</i></p>	<p><i>Describe the control measures implemented to mitigate the risk and describe their desired outcome.</i></p> <p><i>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></p>	<p><i>Summarise findings, if field verification was conducted.</i></p> <p><i>Describe steps taken to address any non-conformities found, unless confidential.</i></p> <p><i>If information is deemed confidential and not published, provide a justification for this.</i></p>
<p><i>on the type of risk assessment used, and not all will be applicable to company risk assessments and 'old' national risk assessments.</i></p>		
Controlled wood category 1. Illegally harvested wood		
1.1	NA Low Risk	NA

1.2	<i>NA Low Risk</i>	<i>NA</i>
1.3	<i>NA Low Risk</i>	<i>NA</i>
1.4	<i>NA Low Risk</i>	<i>NA</i>
1.5	<i>NA Low Risk</i>	<i>NA</i>
1.6	<i>NA Low Risk</i>	<i>NA</i>
1.7	<i>NA Low Risk</i>	<i>NA</i>
1.8	<i>NA Low Risk</i>	<i>NA</i>
1.9	<i>NA Low Risk</i>	<i>NA</i>
1.10	<i>NA Low Risk</i>	<i>NA</i>
1.11	<i>NA Low Risk</i>	<i>NA</i>
1.12	<i>NA Low Risk</i>	<i>NA</i>
1.13	<i>NA Low Risk</i>	<i>NA</i>
1.14	<i>NA Low Risk</i>	<i>NA</i>
1.15	<i>NA Low Risk</i>	<i>NA</i>
1.16	<i>NA Low Risk</i>	<i>NA</i>
1.17	<i>NA Low Risk</i>	<i>NA</i>
1.18	<i>NA Low Risk</i>	<i>NA</i>
1.19	<i>NA Low Risk</i>	<i>NA</i>

1.20	NA Low Risk	NA
1.21	NA Low Risk	NA
Controlled wood category 2. Wood harvested in violation of traditional and human rights		
2.1	NA Low Risk	NA
2.2	NA Low Risk	NA

2.3	<p>Control Measure 1.</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> <ul style="list-style-type: none"> - Conduct a thorough review of Indigenous and Traditional Peoples resources - See checklist Appendix B 	NA
2.4	NA Low Risk	NA
2.5	NA Low Risk	NA

Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities		
3.1	<p>Control Measure 1.</p> <p><i>Evidence Demonstrates that harvesting does not take place in critical habitats for Specified Risk species identified.</i></p> <ul style="list-style-type: none"> - Pre-harvest site visits confirm no critical habitat for specified species at risk identified - Review Maps Appendix A to ensure no crossover between geographic townships where harvesting is taking place and known areas where high conservation values are being threatened e.g. Caribou Maps. 	NA

	https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/related-information/order-summary-critical-habitat-woodland-caribou-boreal-population.html	
3.2	NA Low Risk	NA
3.3	NA Low Risk	NA
3.4	NA Low Risk	NA
3.5	NA Low Risk	NA
3.6	NA Low Risk	NA
Controlled wood category 4. Wood from forests being converted to plantations or non-forest use		
4.1	NA Low Risk	NA
Controlled wood category 5. Wood from forests in which genetically modified trees are planted		
5.1	NA Low Risk	NA

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

Participating site	Supply chain type and supply area	No. of tiers	Risk of mixing	Control measures	Findings from field verification if undertaken as a control measure
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<p><i>This table shall be filled for each applicable participating site (listed in the table in Section 2).</i></p>	<p><i>Describe each type of supply chain e.g.</i></p> <ul style="list-style-type: none"> ● <i>Wood delivered and purchased directly from concession holder to Organisation's log yard</i> ● <i>Wood delivered and purchased directly from concession holder to Organisation's log yard,</i> 	<p><i>'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.</i></p>	<p><i>Summarise the risk assessment of mixing in this supply chain. Justify conclusions.</i></p> <p><i>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</i></p>	<p><i>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</i></p>	<p><i>Summarise findings, if field verification was conducted.</i></p> <p><i>Describe steps taken to address any non-conformities found, unless confidential.</i></p> <p><i>If information is deemed confidential and not</i></p>
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	<p><i>but purchased through a round wood trader.</i></p> <ul style="list-style-type: none"> ● <i>Wood delivered from forest to railway terminal and transported by train to organisation.</i> <p><i>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.</i></p>		<p><i>origin and <u>NO RISK</u> 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.</i></p>	<p><i>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.</i></p>	<p><i>published, provide a justification for this.</i></p>
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<p><i>Murray Bros Lumber Company Ltd.</i></p>	<p><i>Wood delivered directly from concession to Organizations log yard</i></p>	<p><i>1</i></p>	<p><i>NO-RISK</i></p>	<p><i>NA NO-RISK OF MIXING</i></p>	<p><i>NA NO-RISK OF MIXING</i></p>
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5. Technical experts used in the development of control measures

List all technical experts used for developing control measures.

"N/A, technical experts were not required".

6. Stakeholder consultation processes

Summarise all stakeholder consultation processes that the organisation has conducted, including information on:

“N/A, stakeholder consultation not required”

7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact Gaelen Murray (see contact info below). We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

MBLC Complaints Procedure

1. Murray Bros Lumber Company LTD (MBLC) shall develop and implement a procedure for handling comments and complaints from stakeholders related to the Due Diligence Summary, including the following mechanisms:
 - a. MBLC shall acknowledge the complaint via written (electronic or otherwise) notification;
 - b. Inform stakeholders of complaint procedure and initial response within 2 weeks of receipt of complaint;
 - c. Forward to the complaints related to risk designations in the relevant FSC risk assessment to the responsible body;
 - d. Conduct a preliminary assessment to determine whether evidence in the provided complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources;
 - e. Enter into dialogue with complainants in an effort to resolve complaint assessed as substantial before further actions are taken;
 - f. Forward substantial complaints to the certification body and relevant FSC National office for the supply area within two (2) weeks of receipt of the complaint. Information on the steps to be taken by the organization in order to resolve the complaint, as well as how a precautionary approach will be used shall be included with the complaint;
 - g. Employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending;
 - h. Implement a verification process (field and/or desk) for a complaint assessed as substantial by the organization, within two (2) months of their receipt; i. Determine the corrective action to be taken by relevant suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded by the organization;
 - j. Verify whether or not a corrective action has been taken by a supplier and whether or not it has been effective in addressing a complaint; k. Exclude the relevant material and/or supplier if it is deemed that the corrective action was not implemented or if the action did not effectively address the complaint;
 - l. Inform the complainant, the certification body and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution and for maintaining copied of relevant correspondence; and
 - m. Record and file all complaints received and actions taken.

Complaints can be made to:

Gaelen Murray

FSC Coordinator,

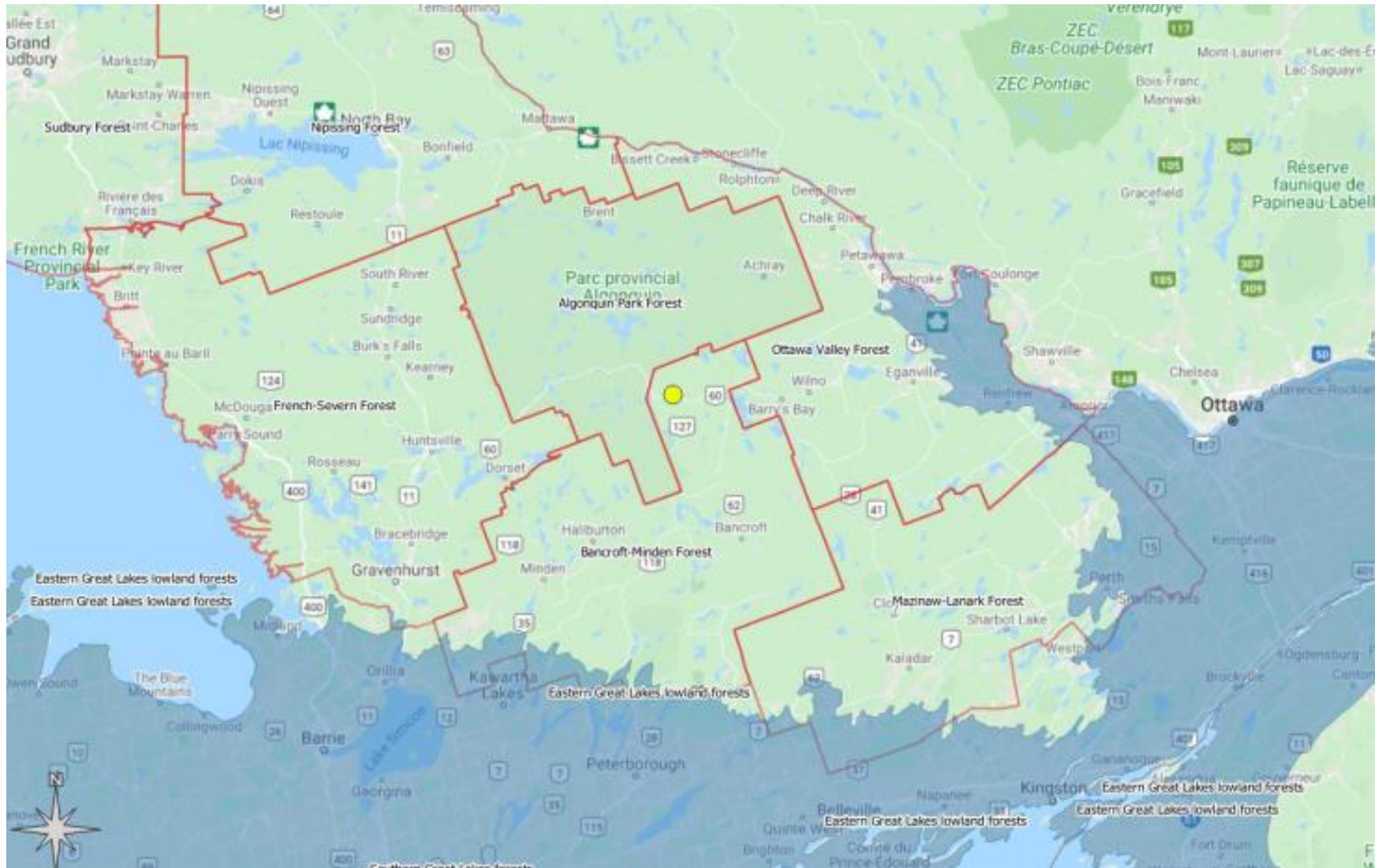
Murray Bros Lumber Company Limited

Box 70 Madawaska ON, Canada

K0J 2C0

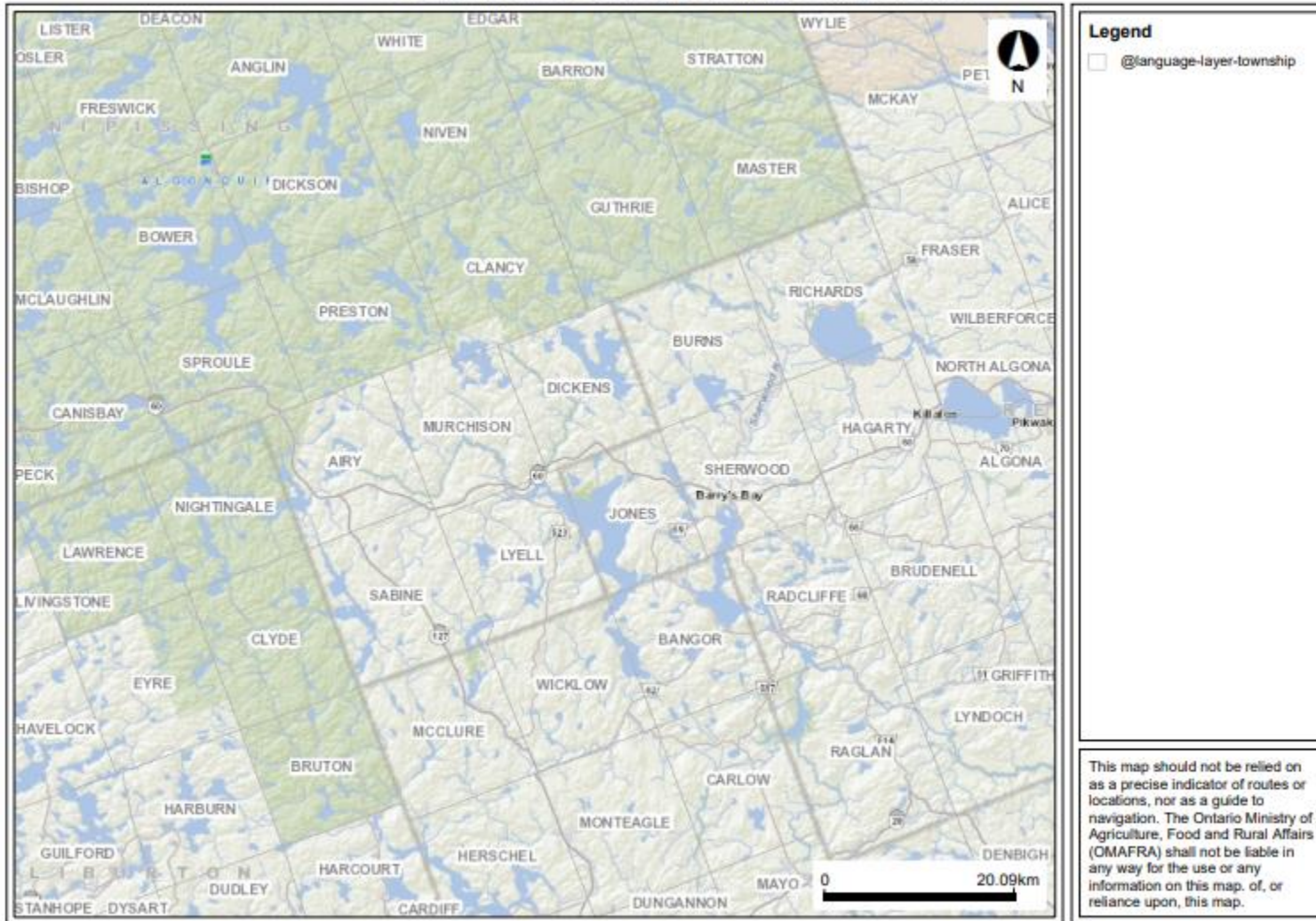
gmurray@murraylumber.com

APPENDIX A Map NRA Risk Cat 3.1 Murray Brothers Supply Area and Ecoregion 6E



APPENDIX A.2 MBLC Source Townships for Nipissing District

Geographic Townships Nippissing District



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Map Created: 5/6/2021
Map Center: 45.51901 N, -77.94187 W

APPENDIX A.3 MBL Source Townships for Hasting County

Hastings County Geographic Townships



5/6/2021, 10:43:18 AM

1:577,791



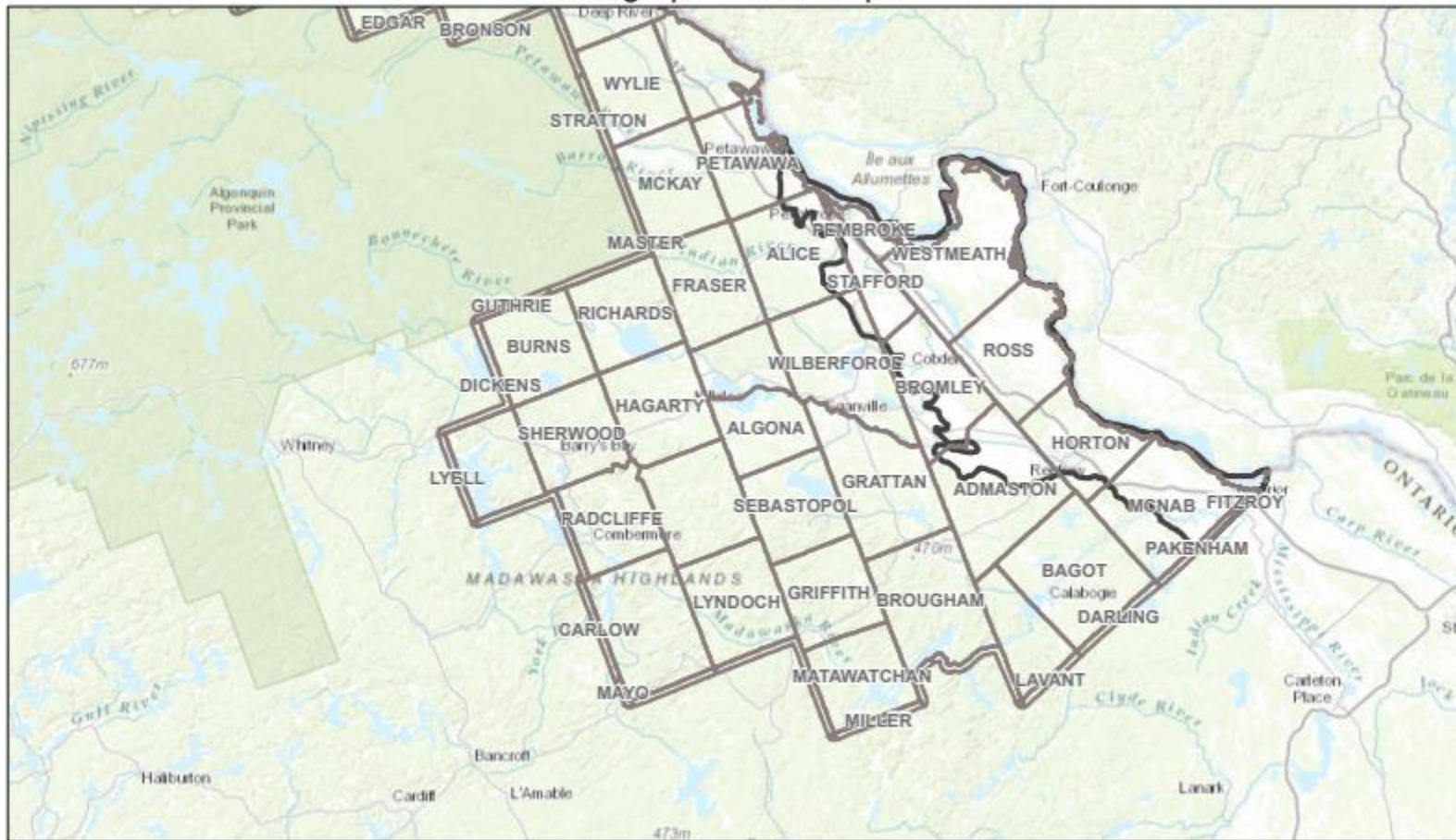
Hastings County, Ontario Base Map, Province of Ontario, Ontario MNR, Esri

Hastings County GIS

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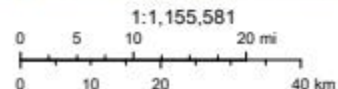
APPENDIX A.4 MBL Source Townships for Renfrew County

Geographic Townships



5/6/2021, 10:32:35 AM

- Geographic Townships
- EcoRegion 6E



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Web AppBuilder for ArcGIS - County of Renfrew

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Appendix B

Rights of Ingenious and Traditional Peoples Checklist for MBLC Resource Sourcing Areas

Murray Brothers Lumber Company Ltd. (MBLC) sources timber from FSC certified crown land in areas belonging to the Algonquins First Nation. Per the National Risk Assessment for Canada FSC-NRA-CA V2-1 EN 2020 Controlled Wood Category 2, Indicator 2.3 *The Rights of Indigenous and Traditional Peoples must be upheld*. MBLC sources material directly from the forest of origin and has primary producer designation.

Control Measure 1 *Indigenous people with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan.*

*(*oppose = opposition demonstrated through active litigation, blockade, protest or other significant conflict of substantial magnitude)*

The purpose of this checklist is to provide evidence supporting the fulfilment of this control measure.

The Algonquins of Pikawanagen (AoPFN) has been identified as the First Nation with legal and/or customary rights to the sourcing area supplying MBLC. Contact information is noted below.

Algonquins of Pikawanagen First Nation
1657A Mishomis Inamo
Pikawanagen
K0J 1X0

Checklist

- Review AoPFN website for evidence of opposition to the Forest Management Plan.
- Conduct a Google search to determine if there is any opposition to the Forest Management Plan by any broader Indigenous Peoples.
- Review the minutes from the most recent Board of Directors meetings for the Sustainable Forest Licenses (SFL) associated with the sourcing areas for any evidence of opposition of the Forest Management Plan by Indigenous peoples

Date Checklist Completed: _____

Checklist Completed by: _____

Title: _____

Signature: _____

Sources:

Government of Canada, First Nation Profiles Interactive Map

<https://geo.aadnc-aandc.gc.ca/cipn-fnpim/index-eng.html>

Native Land

<https://native-land.ca/>

Algonquins of Pikwanagan First Nation

<https://www.algonquinsofpikwanagan.com/>