

Does Ben Hokum and Son Limited meet FSC's Controlled Wood standard?

February 12, 2024

We are carrying out an audit of Ben Hokum and Son Limited located in North Algoma Township, 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 March 26, 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.

Ben Hokum and Son 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

Ben Hokum and Son Limited

FSC certificate code: NC-CW-003999

DDS Summary Oct. 15, 2023

Contact Person: Colin MacKinnon
613-639-0833 (cell)

DDS prepared by Colin MacKinnon, Gerald Ellis and Brenda McCormack.

Risk Assessment:

Supply Areas and Corresponding Risk Assessments for :

Renfrew County

Peterborough County

Kawartha Lakes

Lanark County

Hastings County

Lennox and Addington County

Frontenac County

Parry Sound District

AFA

MRC de Pontiac

Renfrew County, Lanark County, Frontenac County,
Lennox-Addington County, Hastings County,
Peterborough County, Kawartha Lakes

Controlled Wood Category	Reference to Risk Assessment Used	Risk Designation
1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.2	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.3	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.1	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.2	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.3	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.6	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk

Risk Mitigation for the origin of the material

Indicator	Control Measures	Findings from Field verification if undertaken as a control measure
2.3	<p>Control measure 1</p> <p>Currently, Indigenous Peoples with legal and/or customary rights within the Forest Management Unit are not demonstrating opposition to forest harvesting with active litigation, blockade, protest or other significant conflict. Indigenous Peoples within the region are active participants in harvesting.</p> <p>We will monitor the situation and develop control measures should it change to ensure the legal and/or customary rights are upheld.</p> <p>Local news and activity www.countyofrenfrew.on.ca/en/county-government/ www.ptbocounty.ca www.kawarthalakes.ca www.lanarkcounty.ca www.hastingscounty.com www.frontenaccounty.ca www.lennox-addington.ca</p>	

3.1

These counties are located in the Eastern Forest-Boreal Transition ecoregion and the Eastern Great Lakes Lowland Forests ecoregion.

1. Concentration of SAR Critical Habitat

Eastern Great Lakes Lowlands Forests is considered HCV 1 (pg 90 NRA for Canada V2-1)

Control measure 4 applied.

Landowners in the Eastern Great Lakes Lowland Forests ecoregion will be given an information package showing the species with critical habitats in their area, explaining the threats to their critical habitats, how to best reduce the threats to these critical habitats and references to applicable legislation.

2. Critical Habitat for SAR of Special Significance

There is an HCV 1 assessment for the Eastern Forest-Boreal Transition ecoregion

a) *Atlantic-Gaspésie Caribou*

Control measure 1 applied

Atlantic-Gaspésie Caribou found only south of the St. Lawrence River in Quebec. This is not part of the Eastern Forest Boreal Transition ecoregion.

www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html

b) *South Mountain Caribou*

Control measure 1 applied

South Mountain Caribou found in BC which does not contain the Eastern Forest Boreal Transition ecoregion.

<https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/wildlife/>

c) *Boreal Caribou*

Control measure 1 applied

Any critical habitats for the boreal caribou located in the Eastern Forest Boreal Transition ecoregion are found in areas outside of our harvest basket area in these counties.

www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html
<https://www.ontario.ca/page/caribou-boreal-population>

3.2	These counties are not one of the 91 IFLs identified in Table 5 of the NRA (pg 146)	
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Risk Assessment and mitigation for mixing in the supply chain

Supply Chain Type	No. of tiers	Risk of mixing	Control Measures	Finds from field verifications if undertaken as a control measure
Wood delivered and purchased directly from concession holder to organisation's yard	1	No risk		
Wood processing		No risk		
Wood storage		No risk		

Technical experts used in the development of control measures

N/A, technical experts were not required.

Stakeholder consultation processes

N/A, stakeholder consultation not required.

Wood from ATH areas authorized by AFA

Controlled Wood Category	Reference to Risk Assessment Used	Risk Designation
1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.2	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.3	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.1	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.2	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.3	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.6	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
5	Canadian NRA (FSC-NRA-CA-V2-0)	Low Risk

Risk Mitigation for the origin of the material

Indicator	Control Measures	Findings from Field verification if undertaken as a control measure
2.3	<p>Control Measure 1</p> <p>Indigenous Peoples with legal and/or customary rights within the Forest Management Unit are not demonstrating opposition to forest harvesting with active litigation, blockade, protest or other significant conflict. Indigenous People are part of the Advisory group for the AFA Sustainable Forest Management.</p> <p>Algonquin Forestry Authority holds regular public consultations before any activity proceeds. Yearly audits are conducted. The AFA is governed by Algonquin Park regulations and rules.</p> <p>We will monitor the situation and develop control measures should it change to ensure the legal and/or customary rights are upheld.</p> <p>http://Algonquinforestry.on.ca/</p>	
3.1	<p>Algonquin Park is located in the Eastern Forest Boreal Transition ecoregion.</p>	

	<p>1. Concentration of SAR Critical Habitat The ecoregion Eastern Forest-Boreal Transition is not included in Table 1 (pg. 89 - 91 NRA Canada)</p> <p>2. Critical Habitat for SAR of Special Significance</p> <p>a) <i>Atlantic-Gaspésie Caribou</i> Control measure 1 applied Atlantic-Gaspésie Caribou found only south of the St. Lawrence River in Quebec – which does not contain the Eastern Forest-Boreal Transition ecoregion. www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html</p> <p>b) <i>South Mountain Caribou</i> Control measure 1 applied South Mountain Caribou found in BC which does not contain the Eastern Forest-Boreal Transition Ecoregion https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/wildlife/</p> <p>c) <i>Boreal Caribou</i> Control measure 1 applied The boreal caribou is found in northern Ontario in areas outside of the Eastern Forest-Boreal Transition ecoregion. www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html https://www.ontario.ca/page/caribou-boreal-population</p>	
3.2	Algonquin Park is not one of the 91 IFLs identified in Table 5 of the NRA (pg 146)	

Risk Assessment and mitigation for mixing in the supply chain

Supply Chain Type	No. of tiers	Risk of mixing	Control Measures	Finds from field verifications if undertaken as a control measure
Wood delivered and purchased directly from concession holder to organisation's yard	1	No risk		
Wood processing		No risk		
Wood storage		No risk		

Technical experts used in the development of control measures

N/A, technical experts were not required.

Stakeholder consultation processes

N/A, stakeholder consultation not required.

Parry Sound District

Controlled Wood Category	Reference to Risk Assessment Used	Risk Designation
1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.2	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.3	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.1	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.2	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.3	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.6	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk

Risk Mitigation for the origin of the material

Indicator	Control Measures	Findings from Field verification if undertaken as a control measure
2.3	<p>Control Measure 1 Currently, Indigenous Peoples with legal and/or customary rights within the Forest Management Unit are not demonstrating opposition to forest harvesting with active litigation, blockade, protest or other significant conflict. Cultural heritage values are a key component within the forest conservation measures. We will monitor the situation and develop control measures should it change to ensure the legal and/or customary rights are upheld.</p> <p>https://parrysound.com (articles)</p>	
3.1	<p>Parry Sound County is located in the Eastern Forest Boreal Transition ecoregion.</p> <p><u>1. Concentration of SAR Critical Habitat</u> The ecoregion Eastern Forest-Boreal Transition is not included in Table 1 (pg. 89 - 91 NRA Canada)</p>	

	<p><u>2. Critical Habitat for SAR of Special Significance</u> There is an HCV 1 assessment for the Eastern Forest-Boreal Transition ecoregion</p> <p>a) <i>Atlantic-Gaspésie Caribou</i> Control measure 1 applied Atlantic-Gaspésie Caribou found only south of the St. Lawrence River in Quebec. This is not part of the Eastern Forest Boreal Transition ecoregion. www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html</p> <p>b) <i>South Mountain Caribou</i> Control measure 1 applied South Mountain Caribou found in BC which does not contain the Eastern Forest Boreal Transition ecoregion. https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/wildlife/</p> <p>c) <i>Boreal Caribou</i> Control measure 1 applied Any critical habitats for the boreal caribou located in the Eastern Forest Boreal Transition ecoregion are found in areas outside of our harvest basket area of Parry Sound District</p> <p>www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html</p> <p>https://www.ontario.ca/page/caribou-boreal-population</p>	
3.2	Parry Sound County is not one of the 91 IFLs identified in Table 5 of the NRA (pg 146)	

Risk Assessment and mitigation for mixing in the supply chain

Supply Chain Type	No. of tiers	Risk of mixing	Control Measures	Finds from field verifications if undertaken as a control measure
Wood delivered and purchased directly from concession holder to organisation's yard	1	No risk		
Wood processing		No risk		
Wood storage		No risk		

Technical experts used in the development of control measures

N/A, technical experts were not required.

Stakeholder consultation processes

N/A, stakeholder consultation not required.

MRC de Pontiac

Controlled Wood Category	Reference to Risk Assessment Used	Risk Designation
1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.1	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.2	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
2.3	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.1	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.2	Canadian NRA (FSC-NRA-CA-V2-1)	Specified Risk
3.3	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
3.6	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
4	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk
5	Canadian NRA (FSC-NRA-CA-V2-1)	Low Risk

Risk Mitigation for the origin of the material

Indicator	Control Measures	Findings from Field verification if undertaken as a control measure
2.3	<p>Control Measure 1</p> <p>Currently, Indigenous Peoples with legal and/or customary rights within the Forest Management Unit are not demonstrating opposition to forest harvesting with active litigation, blockade, protest or other significant conflict.</p> <p>All wood harvesting is controlled thru marketing boards and permits.</p> <p>We will monitor the situation and develop control measures should it change to ensure the legal and/or customary rights are upheld.</p> <p>Sustainable Forest Development Act. Quebec Wood Order 1983 Act Respecting Threatened or Vulnerable Species'</p>	
3.1	<p>MRC de Pontiac is part of the Eastern Forest-Boreal Transition ecoregion and the Eastern Great Lakes Lowland Forests ecoregion.</p>	

1. Concentration of SAR Critical Habitat

Eastern Great Lakes Lowlands Forests is considered HCV 1 (pg 90 NRA for Canada V2-0)

Control measure 4 applied

Landowners in the Eastern Great Lakes Lowland Forests ecoregion will be given an information package showing the species with critical habitats in their area, explaining the threats to their critical habitats, how to best reduce the threats to these critical habitats and references to applicable legislation.

2. Critical Habitat for SAR of Special Significance

There is an HCV 1 assessment for the Eastern Forest-Boreal Transition ecoregion

a) *Atlantic-Gaspésie Caribou*

Control measure 1 applied

Atlantic-Gaspésie Caribou found only south of the St. Lawrence River in Quebec. This is not part of the Eastern Forest Boreal Transition ecoregion.

www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html

b) *South Mountain Caribou*

Control measure 1 applied

South Mountain Caribou found in BC which does not contain the Eastern Forest Boreal Transition ecoregion.

<https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/wildlife/>

c) *Boreal Caribou*

Control measure 1 applied

Any critical habitats for the boreal caribou located in the Eastern Forest Boreal Transition ecoregion are found in areas outside of our harvest basket area of MRC de Pontiac.

www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html

<https://wildlife-species.canada.ca/species-risk-registry/>

3.2	MRC de Pontiac is not one of the 91 IFLs identified in Table 5 of the NRA (pg 146)	
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Risk Assessment and mitigation for mixing in the supply chain

Supply Chain Type	No. of tiers	Risk of mixing	Control Measures	Finds from field verifications if undertaken as a control measure
Wood delivered and purchased directly from concession holder to organisation's yard	1	No risk		
Wood processing		No risk		
Wood storage		No risk		

Technical experts used in the development of control measures

N/A, technical experts were not required.

Stakeholder consultation processes

N/A, stakeholder consultation not required.

Complaint Procedures:

If the complaints are related to our Due Diligence System.

The procedure to follow is:

- a) acknowledging receipt of the complaint
- b) informing the stakeholders of the complaint procedure and providing an initial response to the complainants within 2 weeks
- c) Conducting a preliminary assessment to determine whether evidence provided is substantial or not substantial, by assessing the provided evidence against the risk of using this material
- d) Discussing with complainant any substantiated complaints, with a goal to resolve
- e) Implementing a precautionary approach by segregating the material received while the complaint is pending
- f) Forwarding the substantiated complaint, the steps taken to resolve this complaint, and the precautionary approach taken to Preferred by Nature and the relevant FSC national office within 2 weeks of receiving the complaint.
- g) Implementing a verification process within 2 months of a received substantiated complaint
- h) If verified that the complaint is substantial, determining what the supplier must do to correct the situation and how it will be monitored.
 - 1) If corrective measures cannot be implemented and enforced, the material will be excluded from our controlled wood.
 - 2) Verifying that corrective measures have been taken by the supplier and are effective.
 - 3) If corrective measures have not been taken by the supplier, the material will be excluded from our controlled wood.
- i) Informing the complainant, Preferred by Nature, and the FSC national office of the results of the complaint, and all attempts towards resolving. All copies of relevant correspondence will be kept.
- j) Keeping records of all complaints received and their outcomes.

If the complaint is related to risk designations in FSC risk assessments, the procedure to follows is:

- a) acknowledging receipt of the complaint
- b) informing the stakeholders of the complaint procedure and providing an initial response to the complainants within 2 weeks
- c) forwarding the complaints to the NRA to FSC Canada
- d) Informing the complainant, Preferred by Nature Canada, and the FSC national office of the results of the complaint, and all attempts towards resolving. All copies of relevant correspondence will be kept.
- e) Keeping records of all complaints received and their outcomes.

