

Est-ce que Papiers White Birch respecte la norme FSC Bois Contrôlé?

6 août 2019

Nous procéderons prochainement à l'audit de Papiers White Birch situé au Québec, Canada afin de vérifier la conformité de leurs activités avec la norme FSC [Bois Contrôlé](#) (FSC-STD-40-005 V3-1). Nous vous adressons la présente pour vous demander si vous connaissez une raison pour laquelle leurs activités ne respecteraient pas cette norme.

Le bois contrôlé est du bois qui respecte les exigences minimales et que l'on peut donc mélanger au bois FSC et utiliser dans les produits portant l'étiquette FSC Mixte. En particulier, le bois ne doit pas provenir de:

- Forêts récoltées illégalement ;
- Forêts récoltées en violation de droits traditionnels ou civils ;
- Forêts dans lesquelles de hautes valeurs de conservation sont menacées ;
- Forêts qui sont converties en plantations ou en territoire à vocation non forestière ; ou
- Forêts où sont plantés des arbres génétiquement modifiés.

L'évaluation se tiendra le 17 septembre 2019 à Québec, le 19 septembre 2019 à Rivière du Loup et le 23 septembre 2019 à Gatineau. Nous vous invitons à fournir des commentaires. Voici vos options pour nous les communiquer:

- Quand ? Avant ou pendant l'évaluation.
- Comment ?
 - En rencontrant un membre du personnel NEPCon en personne.
 - En appelant Anna Luz, membre du personnel NEPCon du Canada. Le numéro de téléphone est le (514) 516-4649
 - En écrivant à Anna Luz à l'adresse suivante P.O. Box 1771 Chelsea, Québec J9B 1A1.
 - En envoyant un courriel à Anna Luz à l'adresse suivante aluz@nepcon.org
 - En envoyant une télécopie à Anna Luz au numéro suivant 1-866-438-1971
 - En organisant une rencontre avec Anna Luz
- Si vous souhaitez que vos commentaires restent confidentiels, veuillez nous en aviser au moment de nous faire parvenir vos commentaires.

Si vous fournissez des commentaires, nous communiquerons avec vous dans les 30 jours suivant l'audit.

Papiers White Birch a rédigé un sommaire public qui énumère :

- Les risques qu'ils ont identifiés qu'ils peuvent s'approvisionner de bois inacceptable.
- Les mesures prises pour atténuer ces risques.

Nous avons joint ce sommaire public à cette lettre.

Les parties prenantes souhaitant contester tout aspect du processus de certification forestière ou décisions prises par NEPCon concernant le respect de cette entreprise avec la norme Bois Contrôlé, peuvent le faire par une demande de plainte formelle à www.nepcon.org.

Nous vous remercions pour toute aide que vous êtes en mesure de fournir.

N'hésitez pas à nous contacter si vous avez des recommandations pour contacter d'autres parties prenantes qui peuvent avoir un intérêt à fournir des commentaires sur cette organisation et cet audit.

Cordialement,

Anna Luz



White Birch Paper™

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Sommaire public

Analyse de risque

FSC-STD-40-005v3.1

29 Juillet 2019

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A. Description de la région d'approvisionnement

L'entreprise s'approvisionne de régions de l'Est de l'Ontario, de l'ensemble des régions du Québec à l'exception de la Côte-Nord. Des sources d'approvisionnement ont également été identifiées dans certains états de la Nouvelle-Angleterre dont le Maine, le Vermont, le New Hampshire, New York et du Massachusetts.

La majorité des forêts publiques en Ontario et au Québec sont certifiées FSC. De plus, plusieurs forêts privées en Ontario, au Québec et au Nouveau-Brunswick sont également certifiées FSC ainsi que plusieurs dans l'état de New York et des forêts publiques des états de New York, Vermont, du Massachusetts.

B. Analyse de risque de bois contrôlé

L'entreprise a réalisé sa propre analyse de risque simplifiée, le Canada prévoyant avoir sa propre analyse de risque nationale d'ici décembre 2018. L'analyse de risque nationale partielle du FSC Canada pour les catégories 1, 2 et 5 a été utilisée. L'annexe A de la norme FSC-STD-40-005v3.1 a servi de cadre pour réaliser l'analyse de risque simplifiée.

L'analyse de risque conclut que l'ensemble des régions d'approvisionnement de Papiers White Birch est de risque faible. Les régions d'approvisionnement en forêt publique de l'Ontario sont toutes certifiées FSC. Il en est de même pour la grande majorité des régions d'approvisionnement du Québec ainsi que de certaines régions des provinces du Nouveau-Brunswick.

L'analyse de risque de l'entreprise est disponible au public.

C. Mécanisme de gestion des plaintes

Après réception d'une plainte à l'égard du système de chaîne de traçabilité, l'entreprise entamera les procédures suivantes :

- a. Confirmer réception de la plainte au plus tard 48 heures après la réception de

celle-ci. Des demandes d'informations et de précision peuvent être formulés à ce moment au plaignant.

- b. Fournir une réponse initiale au plaignant dans une période maximale de deux semaines. Si la plainte est jugée infondée, l'entreprise en informera le plaignant par écrit en lui expliquant pourquoi elle arrive à de telles conclusions, tout en lui offrant la possibilité de fournir de nouvelles informations.

Analyse de risque

- i. Partager la plainte le cas échéant avec l'auteur de l'analyse de risque (p. ex. Initiative nationale pertinente si analyse de risque nationale).
 - ii. Les étapes proposées par l'entreprise pour résoudre la plainte, de même que l'approche de précaution préconisée pour agir en conséquence de la plainte seront également transmises au registraire et à l'Initiative nationale pertinente.
 - iii. Utiliser une approche de précaution pour s'approvisionner de la région d'approvisionnement associée à une plainte en cours d'évaluation.
- c. Si la plainte est jugée fondée, l'entreprise entamera l'analyse de la plainte, identifiera s'il est possible ou nécessaire d'entamer d'autres démarches. Dans l'affirmative, elle spécifiera les actions proposées pour y répondre dans un délai de 2 mois.

Analyse de risque

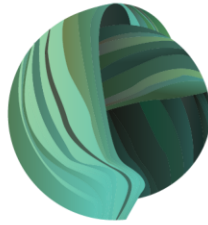
- i. Si la plainte est évaluée et jugée substantielle, une action corrective sera déterminée pour les fournisseurs ainsi que les moyens prévus pour sa mise en œuvre. Si aucune action corrective ne peut être identifiée et/ou sa mise en œuvre non garantie, le matériel et/ou le fournisseur sera exclus par l'entreprise.
 - ii. La mise en œuvre de l'action corrective par les fournisseurs et la vérification si elle est efficace sera vérifiée.
- d. Entreprendre les actions appropriées en relation à la plainte et autres déficiences identifiées lors de l'analyse qui influence la conformité avec des exigences de la certification.
 - e. Aviser le plaignant, le registraire et l'Initiative nationale pertinente lorsqu'il est jugé que la plainte a été adéquatement considérée et résolue.
 - f. Toute documentation en lien à des plaintes sera conservée pour une période minimum de 5 ans.

D. Personne-ressource

Pour nous faire parvenir une plainte, joindre :

André Cameron
Papiers White Birch
Superintendant, services techniques
Courriel : AndreCameron@st.papierswhitebirch.com

Nicolas Blanchette
INCOS Strategies
Courriel : nblanchette@incos.ca

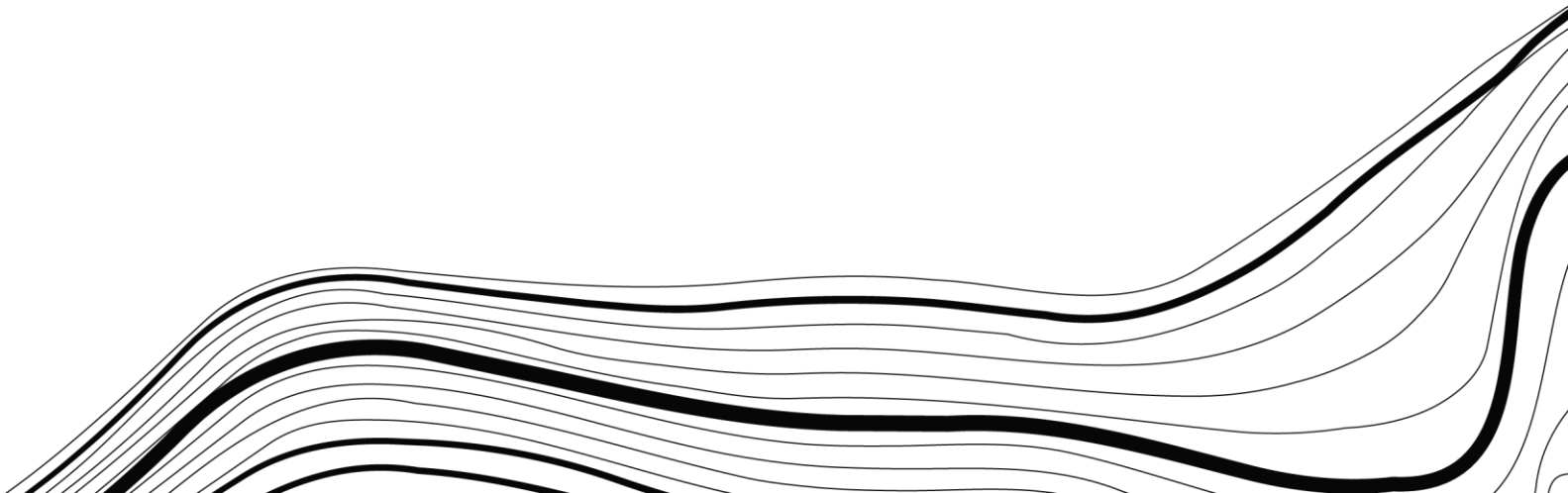


INCOS
strategies

Controlled Wood Risk Evaluation

July 2019

Papiers White Birch



Introduction

The following is a controlled wood risk assessment for Papiers White Birch with mills located in Masson, Quebec city and Rivière-du-Loup in the province of Quebec. After analysing their supply, suppliers and origins of wood supply, the assessment concludes there is a low risk the company could be supplied with uncontrolled wood as defined by FSC.

The risk assessment is in conformance with Annex A of the FSC-STD-40-005 v3.1 standard. Many documents and information found on the web were used to complete the analysis. The preliminary Canadian National Risk Assessment, the final National Risk Assessment for Canada and the FSC Global Forestry Registry form the basis of the report. The FSC US NRA concluded a low risk designation for all states included in the regions of supply of the company. Accordingly, further evaluation was not necessary in the company risk assessment.

The Multi-site manager is responsible of all FSC procedures are implemented and maintained by participating sites and their employees. The organization monitors their suppliers and inform them about FSC requirements and controlled wood.

North American Wood supply

Wood supply of members is sourced from Eastern North America. The present risk assessment considers regions from Ontario, Quebec, New Brunswick in Canada and Northern Eastern States of Maine, New Hampshire, Vermont, New York and Massachusetts.

All supply from publicly owned regions in Ontario are FSC certified as verification of forest origin has confirmed. Certified private lands are also found in the supply basket from Eastern Ontario, Southern and Eastern Quebec. On public lands in Quebec, the majority of defined supply regions are FSC certified. Other FSC certified forests are also present in the provinces of New Brunswick and states of Maine, Vermont and New York.

All suppliers have been contacted and have been requested to sign a voluntary declaration of wood origin as well as wood supply contracts. All of them and their own suppliers provided bills of lading from the forest. With the information gathered, the risk assessment concludes there is a low risk of uncontrolled wood used in FSC products and sales of Papiers White Birch.

Supplier verification and procedures

Suppliers of controlled wood considered in this report signed a declaration of wood origins and supplier contract. All delivery is verified on reception, individually identified and registered in the system. All origins of wood are corroborated with the help of supplier declarations, transport documentation from the forest. On occasions, suppliers themselves confirmed their own radius of supply, which confirmed findings in reference materials.

North America		
Regions	Country	Ecoregions
ONTARIO	Canada	NA0407, NA0602, NA0406, NA0605 and NA0410
NEW BRUNSWICK		
QUÉBEC		
ME, NY, VT, NH, MA	USA	NA0410, NA0411, NA0406, NA0407, NA0414, NA0401

Forest region: Quebec, New Brunswick & Ontario forests

Criteria	Yes	No	Comments
1. The district of origin may be considered low risk in relation to illegal harvesting when all the following indicators related to forest governance are present:			
1.1 Evidence of enforcement of logging related laws in the district	X		<p>The list of applicable laws found on the FSC Global Registry website was used to evaluate this criterion.</p> <p>FSC Global Registry website concludes Canada's forest is considered low risk in relation to illegal harvesting.</p> <p>Private land requirements http://www.mffp.gouv.qc.ca/</p> <p>Sound forest practice guide (http://www.afbf.qc.ca/)</p> <p>CNRA 2016 http://www.gnb.ca/ http://www.canlii.org/</p> <p>Ontario Ministry of Natural Resources Monitoring and Reporting on Ontario's Forests http://www.mnr.gov.on.ca/</p> <p>Ontario State of the Forest Report 2006 http://www.mnr.gov.on.ca/</p> <p>Annual Report on Forest Management</p> <p>Policy instruments documents that govern Ontario's forest resource. http://www.mnr.gov.on.ca/fr/Business/Forests/2ColumnSubPage/STEL02_173854.html</p> <p>"Forest management operations in Ontario are monitored and audited to assess compliance and to evaluate progress and results. Monitoring is conducted for three purposes: compliance, effectiveness and effects."</p> <p>Monitoring and reporting on Ontario's forests: http://www.mnr.gov.on.ca/fr/Business/Forests/2ColumnSubPage/STEL02_168610.html</p> <p>Forest compliance monitoring: http://www.mnr.gov.on.ca/fr/Business/Forests/2ColumnSubPage/STEL02_168591.html</p>

<p>1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.</p>	<p>X</p>	<p>A low level of corruption coupled with strong tenure governance systems throughout the country means low risk of obtaining forest licenses or tax exemptions illegally. (CRNA 2016)</p> <p>(http://www.illegal-logging.info/)</p> <p>(http://www.afandpa.org/)</p> <p>http://www.mffp.gouv.qc.ca/</p> <p>http://www.mnr.gov.on.ca/</p>
<p>1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin.</p>	<p>X</p>	<p>Canada is absent from lists of countries where illegal harvesting is a domestic problem (it only appears due to wood imports).</p> <p>www.mffp.gouv.qc.ca/forets/amenagement/amenagement-RNI.jsp</p> <p>CNRA 2016</p> <p>http://www.gov.ns.ca/</p>
<p>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.</p>	<p>X</p>	<p>Transparency International's 2018 report on corruption perception ranks Canada 9th with a score of 81/100 among countries where this perception is the lowest (http://www.transparency.org/).</p>
<p>2. The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when all the following indicators are present:</p>		

<p>2.1 There is no UN Security Council ban on timber exports from the country concerned.</p>	<p>X</p>	<p>The Risk Analysis of the Global Forest Registry (March 2016) concludes that the risks are low for criteria 2.1 and 2.2 and determined for 2.3 - The rights of indigenous peoples are respected (see below criteria 2.4, 2.5). Low risk for all indicators of category 2 for secondary manufacturers according to FSC Canada NRA.</p> <p>No such ban.</p> <p>Ca.fsc.org</p> <p>Global Witness www.globalwitness.org</p> <p>http://fsccanada.org/</p>
<p>2.2 The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber).</p>	<p>X</p>	<p>Canada is not identified as a source of conflict timber.</p>
<p>2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned..</p>	<p>X</p>	<p>Canada has signed the fundamental ILO Conventions (29, 87, 98, 100, 105, 111, 138, 182).</p> <p>Risk is low</p> <p>http://www.ilo.org/</p> <p>There is no forced labour in the forest.</p> <p>WTO</p> <p>http://en.wikipedia.org/</p>
<p>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 district concerned.</p>	<p>X</p>	<p>http://www.ainc-inac.gc.ca/</p> <p>This demonstrates that there exist “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 district concerned”.</p> <p>http://www.mffp.gouv.qc.ca/</p> <p>http://www.worksmartontario.gov.on.ca/</p> <p>Significant support for a low risk designation can be demonstrated with relevant documentation to the certification body.</p>

<p>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 district concerned.</p>	<p>X</p>	<p>The great majority of supply regions in Quebec are FSC Certified forests. All certificates are in good standing and comply with Principles 3 (Indigenous Peoples), 6 (Environmental Impacts) and 9 (HCVF).</p> <p>The MFFP also adopted a provisional consultation guide of First Nations communities.</p> <p>Papiers White Birch supply regions in Ontario are all FSC certified. All certificates are in good standing and comply with Principles 3 (Indigenous Peoples), 6 (Environmental Impacts) and 9 (HCVF).</p> <p>In Canada there exist structures such as the Aboriginal Human Resource Council, a non-profit organization that “has as launched, hosted and coordinated numerous initiatives with the goal of creating career opportunities for Aboriginal people, leading to their full participation in the Canadian economy” (http://www.aboriginalhr.ca/en/home).</p> <p>There therefore exist consultation, participation or economic distribution mechanisms and opportunities that meet the intent of Convention 169.</p> <p>Significant support for a low risk designation can be demonstrated with relevant documentation to the certification body.</p> <p>www.ainc-inac.gc.ca/ www.fsccanada.org/docs/927c228894a2eb8b.pdf http://www.ilo.org</p> <p>http://www.ainc-inac.gc.ca http://www.gnb.ca/</p> <p>HRSDC 2013</p>
<p>3. The district of origin may be considered low risk in relation to threat to high conservation values if: a) indicator 3.1 is met; or b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1.</p>		
<p>3.1 Forest management activities in the relevant level (eco-region, sub-eco-reion, local) do not threaten eco-regionally significant high conservation values.</p>	<p>X</p>	<p>The Global Forest Registry has concluded a determined risk for Canada for category 3.1.</p> <p>The ecoregions herein are not part of WWF’s “Global 200 ecoregions” that require special consideration. None of Conservation International’s Biodiversity Hotspot are found in Canada.</p>

		<p>Supply from Abitibi, Nord-du-Québec, Saguenay-Lac-St-Jean may come from <u>intact forest landscapes</u> IFL. They are found in the following ecoregions NA0602, NA0605, NA0606 and NA0616. However, there is no forest management activity in ecoregions NA0606 and NA0616.</p> <p>Given the presence of intact forest landscapes, the risk is therefore determined for ecoregions NA0602 and NA0605 under indicator 3.1</p> <p>The analysis determined that the presence of woodland caribou, an endangered species with a large home range, constitutes a risk identified in ecoregion NA0406, NA0602 and NA0605 under indicator 3.1.</p> <p>http://www.mddep.gouv.qc.ca/biodiversite/aires_protegees/index.htm</p> <p>http://www.worldwildlife.org/ http://www.intactforests.org http://www.mffp.gouv.qc.ca/ http://www.livinglegacytrust.org/ http://www.mnr.gov.on.ca/ www.fsccontrolledwood.org (http://www.wwf.ca/) http://www.canlii.org/ http://www2.gnb.ca</p>
<p>3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.</p>	<p>X</p>	<p>In 2015, the World Bank's Rule of Law Index was set at 95% for Canada, one of the best indices in the world. This demonstrates an effective system for enforcing existing laws and regulations.</p> <p>Re :Govindicators.org</p> <p><u>WOODLAND CARIBOU</u></p> <p>Summary and considering:</p> <ul style="list-style-type: none"> - The high proportion of the range of woodland caribou protected or excluded from managed forest areas (80%); - Environment Canada's favorable risk assessment for the largest population in Québec; - The implementation of important elements of the first Québec recovery plan; - the existence of regional management plans for woodland caribou habitat; - various additional precautionary measures; - Favorable data on the status and trend of caribou populations; and, - The existence of protective measures under the Species at Risk Act.

			<ul style="list-style-type: none"> - FSC Certified forests - The significant support for a low risk designation for the woodland caribou for the ecoregions NA0605, NA0602 and NA0406. <p>The risk analysis concludes a low risk designation for the woodland caribou in the short and medium term in the NA0406, NA0602 and NA0605 ecoregions.</p> <p><u>INTACT FOREST LANDSCAPES - IFL</u></p> <p>The analysis shows that, on average, 84% of the IFL are above the northern limit of allocated commercial forests. Across the province, more than 95% of the total area of IFL is protected. Conversely, this means forestry activities could only be carried out on up to 5% of the IFL present in Quebec in the short, medium and long term. At the scale of ecoregions NA0602 and NA0605, respectively 93% and 86% of the area of IFL enjoy full permanent or temporary protection (15-70 years).</p> <p>Significant support from both Ontario and Quebec for a low risk designation associated with IFL can be demonstrated with relevant documentation to the certification body.</p> <p>IFLs in Ontario are all on certified management units with the exception of Spanish and Temagami management units. Stakeholders support is also available for a low risk designation.</p> <p>In light of these findings, the risk is low IFL do not benefit from a strong protection system (legislation and effective protected areas) ensuring they remain intact in ecoregions NA0602 and NA0605.</p> <p>cbc.ca http://www.ccqf-cqfb.ca/</p> <p>Rule of law above between 90-100% http://info.worldbank.org/ Canada rightified the Biodiversity Convention.</p>
<p>4. The district of origin may be considered risk in relation to conversion of forest plantations or non-forest uses when following indicator is present:</p> <p>[NOTE: the change from plantations to other land uses is not considered as conversion].</p>			
4.1 There is no net loss AND no significant rate of loss (> 0.5% per year) of natural forests and	X		http://www.conferenceboard.ca The Canadian Forest Service in 2019 estimated the deforestation rate for the province close to null.

<p>other naturally wooded ecosystems such as savannahs taking place in the eco-region in question.</p>			<p>The FAO's State of the World's Forests 2010 report indicate that Canada's forest cover has not changed between 1990 and 2010. (www.fao.org)</p> <p>ESSA Technologies Ltd.'s http://www.mnr.gov.on.ca/</p>
<p>5. The district of origin may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is complied with:</p>			
<p>a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned. OR</p>	<p>X</p>		<p>There is no commercialization of genetically modified trees in Quebec. The Canadian Food Inspection Agency (CFIA) is responsible for regulating the release into the environment of plants with novel traits. "These plants can not be placed on the market until a rigorous assessment has been conducted by the CFIA and Health Canada to confirm that they pose no risk (...) if they are disseminated throughout Canada. environment like other conventional plant varieties grown in Canada. www.cban.ca</p> <p>Currently, the only GM species that is commercially harvested is <i>Populus nigra</i> from China. (http://fsccontrolledwood.org/)</p>