



FSC Canada  
National Risk Assessment  
Technical FAQ  
Version 2023-10-06



| Subject | NRA Version | Question   | Answer   | Date Answered |
|---------|-------------|--|--|---------------|
| General | V2-0        | What is the difference between "mandatory" and "recommended" control measures?   | <p>When mandatory control measures are identified in the National Risk Assessment (NRA), Certificate Holders shall demonstrate implementation of one or more of those control measures as required under indicator 4.12 of FSC-STD-40-005 V3-1. Mandatory control measures can only be replaced by alternative control measures under a specific set of conditions outlined at indicator 4.13 of FSC-STD-40-005 V3-1</p> <p>Recommended control measures represent an option for certificate holders as to how the identified risk may be mitigated. There are no obligations for the certificate holder to implement any of the recommended control measures. However, because recommended control measures have already been approved by FSC Canada, they don't need to be evaluated against indicators 4.2 to 4.11 of FSC-STD-40-005 V3-1. An Organization choosing not to implement any of the recommended control measures, but instead choosing to establish its own control measure, will need to have its control measure evaluated against indicators 4.2 to 4.11 of FSC-STD-40-005 V3-1.</p> | 2020-09-01    |
| CM 2.3  | V2-0        | The way control measures for indicator 2.3 are presented, it appears that control measures #1-4 are only recommended for primary producers and control measures #5 is only recommended for non-primary producers. Is that correct? Could a Certificate holder that is a primary producer elect to only implement control measure #5? | <p>Answer to question #1<br/>Control measures #1-4 are recommended for primary producers. Control Measures #1-5 are recommended for non-primary producers. In other words, Control Measure #5 is NOT a recommended control measure for primary producers. That being said, these control measures are "recommended" and can be replaced with alternative control measures, so long as they are sufficient to mitigate the risk. However, an Organization choosing not to implement any of the recommended control measures, but instead choosing to establish its own control measure, will have to demonstrate conformance to indicator 4.2 to 4.11 of FSC-STD-40-005 V3-1 .</p> <p>Answer to question #2<br/>If a primary producer elects to only implement control measure #5, which is neither a mandatory nor a recommended control measure for primary producers, the Certificate holder will have to</p>  | 2020-09-01    |



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|                     |      |  | demonstrate conformance to indicator 4.2 to 4.11 of FSC-STD-40-005 V3-1 for control measure #5.  |            |
| CM 2.3, 3.1, 3.2 #3 | V2-0 | In some part of Canada, Indigenous Communities create Indigenous-owned corporations to enter into agreements (ex: SFL in Ontario) with provinces for the implementation of an Indigenous-led forest management plan. Can such an agreement between an Indigenous-owned corporation and a Province be considered a government-to-government agreement and meet the requirement of CM #3?  | No, the situation described does not meet the control measures for the following reason:<br>1. The control measure requires an Indigenous-led or co-developed <u>Land use plan</u> , while the situation described refers to an Indigenous-led <u>Forest management plan</u> .   | 2021-06-30 |
| CM 2.3, #5          | V2-1 | Question #1<br>Can a certificate holder* rely on an existing dispute resolution process established by another entity/organization (ex: government) to meet this control measure?<br><br>Question #2<br>In the event that a dispute of substantial magnitude arises, can the certificate holder* rely on another entity/organization to implement its dispute resolution process to meet the control measure?<br><br>*In this case, a non-primary producer | Answer to question #1<br>Control measure 2.3 - #5 does not specify who should establish or own the dispute resolution process. It simply requires that “A dispute resolution process is established”. Therefore, as long as a dispute resolution process exists, the first part of the control measure is met.<br><br>Answer to question #2<br>Control measure 2.3 - #5 does not specify who should implement the dispute resolution process in the event of a dispute of substantial magnitude. Therefore, as long as the dispute resolution process is being implemented, even by a third party, the second part of the control measure is met. Clear evidence of implementation must be provided.<br><br>In the event where a third party is not implementing its dispute resolution process, the responsibility falls back to the certificate holder to establish and implement a dispute resolution process, or to implement an alternative control measure.<br><br>Dispute of substantial magnitude is defined in the FSC National Forest Stewardship Standard of Canada FSC-STD-CAN-01-2018 | 2022-09-12 |





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| <p>CM 2.3<br/>#1-5</p> | <p>V2-1</p> | <p>Question #1:<br/>Does a company that source/receive wood directly from the forest, stores it in its log yard/transit yard located outside of the forest of origin and resells it to its customers without processing it, qualify as a primary producer even though they are not processing the material?</p> <p>Question #2<br/>Does a company that purchase unprocessed roundwood stored in a log/transit yard located outside of the forest of origin (as described at question #1) qualifies as a non-primary producer?</p> <p>Question #3<br/>Does a company that source roundwood directly from the forest of origin, store it in a transit yard located outside of the forest of origin, then transport it to its manufacturing facility (in other words the company own the wood throughout the process, but does not receive roundwood or chips “directly” from the forest of origin) qualifies as a “non-primary producer”?</p> | <p>General answer:<br/>The NRA’s definition of “primary producer” is based solely on the type of material (roundwood or chips) and on the origin of the material being sourced/received (sourced/received directly or not from the forest of origin), and does not take into account the type of manufacturing activities the organization is involved in. The source of the material dictates which control measures can be implemented for risk indicator 2.3: #1 to 4 being reserved for when the material is sourced/received directly from the forest of origin, while control measure #5 being reserved for when the material is not received directly from the forest of origin.</p> <p>Answer #1<br/>In question #1, the company that source/receive roundwood directly from the forest, stores it in its log yard/transit yard outside of the forest of origin and resells it to its customers without processing it, meet the definition of a primary producer even though they are not processing the material. Therefore, that company must implement one or the control measure #1 to 4 of indicator 2.3, for that specific source of material.</p> <p>Answer #2<br/>In question #2, the company purchases roundwood that has already been harvested, transported and stored outside of the forest of origin by its supplier. Because the roundwood is not sourced/received directly from the forest of origin, the company does not meet the definition of primary producer for that specific source of material. The company is therefore eligible to implement control measure #5 of indicator 2.3 for that specific source of material</p> <p>Answer #3<br/>In question #3, the fact that the roundwood owned by the company is stored temporarily in a transit yard between the forest of origin and the manufacturing facility still qualifies the company as a primary producer for that specific source of material, and does not relieve it from its obligation to implement one of the control measure #1 to 4 of indicator 2.3, for that specific source of material</p> | <p>2023-06-29</p> |
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| CM 3.1    | V2-0 | Are certificate holders sourcing from private Small & Low Intensity Managed Forests obligated to implement control measure #4 for 3.1 HCV 1?   | No, there are no obligation for certificate holders sourcing from private Small & Low Intensity Managed Forests (SLIMF) to implement control measure #4 for 3.1 HCV1. As stated in the NRA, certificate holders are required to implement one or more of the listed control measures "for each species whose critical habitat has been identified within a Specified Risk ecoregion (Table 1)". Any of the 10 mandatory control measures listed at 3.1 HCV 1 can be implemented for mitigating the risk on private SLIMF forests, as long as the control measure is allowed for the particular species. However, control measure #4 for 3.1 HCV1 can <b>only</b> be implemented on private Small & Low Intensity Managed Forests. It cannot be implemented on public land or on a private land not meeting the SLIMF criteria in Canada. | 2020-09-01 |
| CM 3.1    | V2-0 | Do I understand that the 10 control measures for 3.1 HCV1 can be implemented by Primary producers as well as Non-Primary producers?  | In general, mandatory or recommended control measures can be implemented by any category of certificate holders, unless there is mention in the NRA that the control measure is restricted to a specific category of certificate holders. In this specific case (indicator 3.1 HCV1), all control measures can be implemented by both primary and non-primary producers.   | 2020-09-01 |
| CM 3.1 #7 | V2-0 | Is it possible for a certificate holder to implement control measure 3.1-#7 without demonstrating that management of caribou habitat meets the full intent of 6.4.5 of the FSC Canada National Forest Management Standard? | No, as stated in the control measure 3.1-#7, the management plan for woodland caribou shall be "implemented as described in Indicator 6.4.5 of the FSC Canada National Forest Management Standard (NFSS)", including each sub-requirements of the indicator. For example, a certificate holder attempting to demonstrate that a management plan for woodland caribou is in conformance with indicator 6.4.5c of the NFSS would have to demonstrate that each sub-requirement #1 to 9 are being met.  | 2021-05-07 |



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| <p>CM 3.1 #8</p> | <p>V2-0</p> | <p>Is it possible for a certificate holder to implement control measure 3.1 #8 without demonstrating that forest management plans either maintain undisturbed habitat or are working to increase undisturbed habitat to the 65% undisturbed threshold outlined in the Federal Recovery Strategy?</p>   | <p>The fact that a management plan for woodland caribou is implemented for the sourcing area is not sufficient to meet control measure 3.1 #8.</p> <p>As stated in the last paragraph of control measure 3.1 #8, a rationale must be provided as to how the actions contained in the management plan for woodland caribou will <u>contribute</u> to maintaining (in cases where the threshold has already been met) or <u>contribute</u> to increasing the level of undisturbed habitat over time, <u>in support</u> of meeting the undisturbed % threshold requirements established in the Federal Recovery Strategy.</p>   | <p>2021-05-07</p> |
| <p>CM 3.1 #8</p> | <p>V2-1</p> | <p>Can you clarify if the sentence found at the end of control measure 3.1 #8, (<i>Rationale is provided as to how such actions will contribute to reducing the level of disturbance over time in critical habitat*, in support of meeting the threshold<sup>3</sup> requirements in the Federal Recovery Strategy.</i>) applies to both options a) and b)?</p>  | <p>The sentence found at the end of control measure 3.1 #8 <b>applies to both</b> options a) and b). Therefore, certificate holders implementing control measure #8 are always required to provide a rationale as to how actions included in the management plan will contribute to reducing the level of disturbance over time in critical habitat, in support of meeting the threshold requirements in the Federal Recovery Strategy.</p>  | <p>2023-10-06</p> |
| <p>CM 3.1</p>    |             | <p>The first sentence of CM 3.1 HCV1 reads as follow:</p> <p><i>“For each species whose critical habitat* has been identified within a Specified Risk ecoregion (Table 1), one or more of the following control measures shall be demonstrated, as applicable.”</i></p> <p>Question:<br/>Does that mean that the mandatory control measures identified in the NRA can only be applied for the species associated</p> | <ul style="list-style-type: none"> <li>• Six (6) ecoregions have been designated as Specified Risk ecoregions due to the high concentration of Species at Risk (SAR critical habitats (SRR &gt;3). These 6 ecoregions are listed at Table 1 of NRA V2-1 (p 91-92).</li> <li>• Twenty (20) ecoregions have also been designated as Specified Risk ecoregions due to the presence Woodland Caribou. These 20 ecoregions are listed at p.94-95 of NRA V2-1.</li> <li>• One ecoregion, Eastern Canadian Forest, is present on both lists</li> <li>• Therefore, a total of twenty-five (25) ecoregions have been designated as Specified Risk. The full list can be found at p.86 of NRA V2-1.</li> </ul> <p>As stated in the first sentence of "Mandatory Control Measure 3.1 HCV1" at page 123 of NRA V2-1, a control measure shall be implemented for each species whose critical habitat has been identified within one of the six (6) Specified Risk ecoregions listed at table 1, BUT ALSO for Woodland Caribou</p> | <p>2022-01-11</p> |





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|           |      | with the 6 ecoregions listed at Table 1? What about the remaining 19 ecoregions listed as Specified Risk ecoregions in the NRA?   | <p>whose habitat has been identified within one of the twenty (20) Specified Risk ecoregions listed at p.94-95 of NRA V2-1 .</p> <p>For example, the ecoregion "Eastern forest-boreal transition" has been designated as specified risk due to the presence of Woodland Caribou. Therefore at least one control measure shall be implemented for Woodland Caribou. However, "Eastern forest-boreal transition" is not listed at Table 1, which means that no other control measures need to be implemented other than the one(s) for Woodland Caribou.</p> <p>In another example, a company sourcing from "Eastern Canadian Forest" in Newfoundland would have to implement one control for <i>American Marten (Newfoundland Population)</i> as specified in Table 1, but also one control measure for Woodland Caribou because the ecoregion is listed as one of the 20 specified risk ecoregions for Woodland Caribou.</p> |            |
| CM 3.2    | V2-0 | Can a certificate holder use the "FSC Canada - Interim Guidance for delineation of Intact Forest Landscape May 25, 2017" developed for forest management certification to redefine what is considered an IFL in the NRA?  | No, the methodology used to identify IFLs in the NRA differs from the methodology used to define IFLs in the context of forest management certification. Certificate holders using the Canadian NRA are required to use the IFL shapefile provided on the FSC Canada website ( <a href="https://ca.fsc.org/en-ca/standards/national-risk-assessment-01">https://ca.fsc.org/en-ca/standards/national-risk-assessment-01</a> ) when demonstrating implementation of the 3.2 HCV2 control measures.   | 2020-10-08 |
| CM 3.2 #2 | V2-1 | With the understanding that the IFL baseline must be based on the data provided by Global Forest Watch 2016 (or IFL shapefile provided by FSC Canada), what methodology should be used to assess the reduction in the size of an IFL and the cumulative impact of forest operations on an IFL required for the implementation of control measure #2 of HCV 3.2? | The control measure #2 for HCV 3.2 included in the National Risk Assessment (NRA) for Canada V2-1 does not specify the methodology that should be used to calculate the reduction in the size of an IFL and the cumulative impact of forest operations. Therefore, until FSC Canada specifies the methodology in a revised version of the NRA, a certificate holder can use the methodology that they consider the most appropriate, with or without the use of buffers. At this moment, FSC Canada acknowledges that the methodological approach for IFL in the NRA & in the FSC Intl Advice Note #18 is not well aligned. FSC Canada is working to understand how there can be greater alignment.  | 2020-10-12 |



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|        |      | Are certificate holders (CH) required to use the same methodology used by Global Forest Watch (i.e. with buffers), to calculate the reduction in size, or can they simply deduct the total areas of cumulative disturbances caused by forest operations (i.e., without buffers) from the IFL baseline?   |   |            |
| CM 4.1 | V2-0 | In order to mitigate risk at 4.1 and demonstrate implementation of CM#3, can FSC Canada clarify who's support the Organization is required to demonstrate? Is the Organization itself required to support and/or participate in existing integrated land management (ILM) processes (direct effort or involvement by the Organization)? Or can the Organization demonstrate indirect efforts and involvement by other companies and certificate holders to support ILM processes in the sourcing area? | The control measure should be read as it is written in the NRA and not be interpreted as requiring the certificate holder to directly support or participate in ILM processes. The control measure only requires the Organization to demonstrate "support", which includes indirect efforts and involvement by other companies and certificate holders to support ILM processes in the sourcing area. | 2020-10-08 |