



ELEMENT5

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SERVICES

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## Public Notification Letter

### FSC® Chain of Custody Controlled Wood Stakeholder Consultation

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To: Interested Parties

From: SCS Global Services

Consultation period: **12/8/2025 – 01/19/2026**

Re: Notification of intent to audit **Element5 Limited Partnership** against FSC Chain of Custody Controlled Wood standard FSC-STD-40-005 V3-1

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The Forest Stewardship Council® (FSC) requires that a certification body conducting an audit of a certified organization or applicant must consult stakeholders whenever the audit includes intent to source and use uncertified material in an FSC Chain of Custody (CoC) program according to the requirements in FSC-STD-40-005 V3-1 “Requirements for Sourcing FSC Controlled Wood”. Therefore, SCS Global Services (SCS) is seeking input from interested and directly affected stakeholders regarding the relevance, effectiveness, and/or adequacy of **Element5 Limited Partnership** Due Diligence System (DDS).

An explanation of ‘FSC Controlled Wood’, as well as a copy of FSC-STD-40-005 V3-1, is available here: <https://ic.fsc.org/en/certification/types-of-certification/controlled-wood-02> ; a copy of this standard is also available from SCS upon request.

Due Diligence Systems are required for certified organizations in order to avoid the sourcing and use of material originating from unacceptable sources in their FSC CoC program.

Directly affected stakeholders include any person, group of persons, or entity that is, with high probability, subject to the effects of the activities related to an organization’s controlled wood sourcing program, including the activities of their suppliers and sub-suppliers, as well as those who influence risk identified through the organization’s Due Diligence System.

***This letter serves as SCS’ invitation to directly affected stakeholders to participate in our consultation process. This letter also serves as SCS’ public notification for any interested stakeholders, who are also invited to participate in the consultation process. Participation in this stakeholder consultation process is voluntary; stakeholders are not required to submit comments.***

#### **Scope of audit and audit details:**

The audit will assess the conformity of the organization’s controlled wood program – including Risk Assessment(s) and DDS – according to the certification requirements as per FSC-STD-40-005 V3-1.



The company's DDS Public Summary and Risk Assessment (excluding confidential information), as well as any other information or documents deemed relevant for the purpose of this stakeholder consultation, are included as appendices to this letter—see below. For a list of the information that is required to be publically available for stakeholder consultation by SCS, see FSC-STD-40-005 V3-1, Section 6.

**Additional certificate holder information:**

<https://app.powerbi.com/view?r=eyJrIjoib2U3NGMyNWEtZTAxNS00MzVhLWExNmMtOTZhZjdiYjQ4MWNkIiwidCI6IjEyNGU2OWRiLWVmNjUtNDk2Yi05NmE5LTVkNTZiZWxZDI5MSIsImMiOiI9>

**Options for participation and provision of comments:**

Please submit written comments and evidence (where appropriate) by mail, FAX or email to SCS:

SCS Global Services  
Att'n: Chain of Custody Certification Services  
2000 Powell Street, Suite 600  
Emeryville, CA 94608

Fax: 510-452-6882

Email: [CWStakeholder@SCSGlobalServices.com](mailto:CWStakeholder@SCSGlobalServices.com)

A summary of the stakeholder consultation and comments received will be made publically available on the FSC certificate database, as per FSC-STD-20-011 V4-2. Verbatim comments will only be published with prior consent from the stakeholder and will not be associated with stakeholder names.

Note that, while SCS is required to evaluate all information and comments objectively, SCS certification decisions are affected by stakeholder comments only insofar as the comments provide evidence of conformity or nonconformity to the applicable requirements.

Within 30 days of making our certification decision, SCS will respond to all stakeholders who provided comments to explain how their comments were taken into account.

More information about FSC and SCS can be found on our respective websites: [www.fsc.org](http://www.fsc.org) and [www.scsglobalservices.com](http://www.scsglobalservices.com).

## **Element5 FSC® Publicly Available Controlled Wood Due Diligence System and Risk Assessment Summary**

**The Element5 FSC Controlled Wood Due Diligence System and Risk Assessment are publicly available by request from Element5. While the certification body and Assurances Services International have access to this document in its entirety, sections proprietary to Element5 are removed when distributing the document to suppliers or other parties.**

### **Part One – Introduction**

Element5 Limited Partnership LP (Element5) (<https://elementfive.co/>) is based in St Thomas, Ontario Canada producing mass timber products including cross-laminated timber, glued laminated timber, cross-laminated insulated panels and nano clt. Mass timbers are produced for individual projects located in Canada and the USA.

Element5 maintains FSC Chain of Custody (CoC) certificate number SCS-COC-008405 allowing Element5 to make certification claims on products.

Element5 sources lumber for its mass timber products from Canada. The supply area is defined as Canada. Emphasis is placed on the purchase of FSC certified materials where feasible. In the event that materials required as inputs for mass timber projects are not available as FSC certified, the Element5 FSC Controlled Wood (CW) Due Diligence System (DDS) is applied to controlled materials allowing Element5 to include materials in products as FSC Controlled Wood, to be mixed with FSC certified materials, resulting in products with a FSC Mix percentage claim.

The Element5 FSC CW DDS meets the requirements of the FSC CW Standard:

- FSC-STD-40-005 V3-1 – ‘Requirements for Sourcing FSC Controlled Wood (FSC CW Standard).
- FSC-NRA-CA V2-1 – ‘FSC National Risk Assessment For Canada’ (FSC Canada NRA).

The Element5 FSC CW DDS and associated Risk Assessment are based on the following:

- The supply area is all of Canada.
- Element5 is not a forest manager and cannot practically apply Control Measures as required by the FSC CW Standard. Each project sourcing controlled material might source a different forest manager in Canada.
- Element5 purchases materials for projects where the customer requires a FSC certified claim. FSC certified materials are purchased preferentially or alternatively FSC Certified Controlled Wood are purchased where available. Where FSC certified or Controlled Wood materials are not available Element5 will only purchase materials where the materials meet the Element5 FSC CW DDS and Risk Assessment and materials are deemed low risk and FSC Controlled Wood.
- The Element5 FSC CW DDS and Risk Assessment is based on the FSC Canada NRA providing initial risk results.
- The Element5 FSC CW DDS and Risk Assessment is based on controlled materials avoiding sourcing unacceptable material considered ‘specified risk’, where Element5 has determined ‘low risk’ by conducting a Detailed Risk Assessment specific to the sourcing of a project. Avoidance is the only control measure applied by Element5.

## Part Two – FSC Controlled Wood Due Diligence System

### 2.1 DDS Procedures

2.1.1 Element5 will use FSC terminology and FSC definitions regarding the Element5 DDS and Element 5 Risk Assessment.

2.1.2 The Element5 Detailed Risk Assessment considers all suppliers and sub-suppliers.

2.1.3 The Element5 initial risk assessment is based on the most recent version of the FSC Canada NRA and incidences of ‘specified risk’ are consistent with the Canada NRA.

2.1.4 Regarding supply initially designated as specified risk by the Canada NRA, Element5 will obtain information allowing Element5 to reach a determination of ‘low risk’, to an area with homogeneous risk designation for each controlled wood category, including:

2.1.4.1 Evidence of origin

2.1.4.2 Information about supply chain

2.1.4.3 Information about supplier or sub-supplier forest management or chain of custody certification systems will be given weight where these systems apply to specified risk at the origin level or risk of mixing in the supply chain.

2.1.4.4 Interview or written assurance statements will be considered as evidence of attaining a low risk designation. In particular, suppliers or sub-suppliers evidence involving field verification will be given weight. Element5 does not anticipate conducting field verification. In particular, assurance statements made by registered forest professionals or biologists, regarding origin or specified risk or risk of mixing will be given weight.

2.1.5 Element5 shall assess and document the risk of mixing material with non-eligible inputs in its supply chains during transport, processing, and storage

### 2.2 Person Responsible For Addressing Complaints

Maria Calpito  
Element5  
70 Dennis Road, St Thomas  
Ontario, Canada, N5P 0B6  
[maria@elementfive.co](mailto:maria@elementfive.co)  
204-963-0218

### 2.3 FSC CW Complaint Procedure

- a) Acknowledging receipt of complaints;
- b) Informing stakeholders of the complaint procedure, and providing an initial response to complainants within a time period of two (2) weeks;
- c) Forwarding complaints related to risk designations in the relevant FSC risk assessment to the responsible body for the Canada NRA;

- d) Conducting a preliminary assessment to determine whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources;
- e) Dialogue with complainants that aims to solve complaints assessed as substantial before further actions are taken;
- f) Forwarding 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) Employing a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending;
- h) Implementing a process (e.g. field verification and/or desk verification) to verify a complaint assessed as substantial by the organization, within two (2) months of its receipt;
- i) Determining the corrective action to be taken by 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) Verifying whether corrective action has been taken by suppliers and whether it is effective;
- k) Excluding the relevant material and suppliers from the organization's supply chain if no corrective action is taken;
- l) Informing 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 copies of relevant correspondence; and
- m) Recording and filing all complaints received and actions taken.

## Part 3 – Initial Risk Assessment – Canada NRA

Appendix A is the FSC Canada NRA Summary V2-0.

## Part 4 – Element5 Control Measures

CW Risk Category	Control Measure
2.3 – Indigenous Peoples' rights	<p>Specified Risk for Canada</p> <p><b>Control Measure # 1: Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose the Forest Management Plan</b></p> <p><i>Guidance: oppose = opposition demonstrated through active litigation, blockade, protest or other significant conflict of substantial magnitude.</i></p>

<p>3.1 – HCV 1 Species diversity</p>	<p>Specified Risk for the following ecoregions:</p> <ul style="list-style-type: none"> <li>• Southern Great Lakes forest</li> <li>• Eastern Great Lake lowland forest</li> <li>• Central Pacific coastal forest</li> <li>• Eastern Canadian forest</li> <li>• New England Acadian forest</li> <li>• Puget Lowland forest</li> <li>• Eastern Canadian Shield taiga</li> <li>• Central Canadian Shield forests</li> <li>• Eastern forest-boreal transition</li> <li>• Midwestern Canadian Shield forest</li> <li>• Mid-Continental Canadian forests</li> </ul>
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	<ul style="list-style-type: none"> <li>• Southern Hudson Bay taiga</li> <li>• Northern Canadian Shield taiga</li> <li>• Canadian Aspen forests and parklands</li> <li>• Alberta-British Columbia foothills forests</li> <li>• Muskwa-Slave Lake forests</li> <li>• Northwest Territories taiga</li> <li>• Fraser Plateau and Basin complex</li> <li>• Northern transitional alpine forests</li> <li>• Central British Columbia Mountain forests</li> <li>• British Columbia mainland coastal forests</li> <li>• Northern Cordillera forests</li> <li>• Alberta Mountain forests</li> <li>• North Central Rockies forests</li> <li>• Okanagan dry forests</li> </ul> <p><b>Control Measure # 1: Evidence demonstrates that harvesting does not take place in critical habitats for Specified Risk species identified</b></p>
3.2 – HCV 2 Intact forest landscapes	<p>Specified Risk for 91 IFLs identified in Table 5 of the NRA</p> <p><b>Control Measure # 1: Forest operations do not occur within IFLs.</b></p>
3.4 – HCV 4 Ecosystem services	<p>Specified Risk for Yukon and NW Territories</p> <p><b>Control Measure: Avoid sourcing from Yukon and NW Territories</b></p>
4.1 - Conversion	<p>Specified Risk for the following Reconciliation Units:</p> <ul style="list-style-type: none"> <li>• RU 12 – Quebec Mixedwood Plains</li> <li>• RU 34 – Alberta Boreal Plains</li> <li>• RU 39 – British Columbia Boreal Plains</li> </ul> <p><b>Control Measure # 1: Evidence demonstrates that supplied material does not originate from areas converted to non-forest</b></p> <p><i>Verifier: A valid Forest Management Plan is in place and covers Specified Risk areas.</i></p>

## Part 5 - Summary of FSC CW Supply Detailed Risk Assessment PJ-292 Project

A Detailed Risk Assessment for PJ-292 Project was conducted dated May 9, 2025. While this is considered a proprietary document, and is distributed only to the certification body and Assurance Systems International, the following is a summary of the results.

<b>CW Category</b>	<b>Risk</b>	<b>Evidence</b>
1.1-1.21 Illegal harvesting	Low risk for Canada	FSC Canada NRA
2.1-2.2. Armed conflict and worker rights	Low risk for Canada	FSC Canada NRA
2.3. Indigenous Peoples' rights	Low risk for supply area involved in production of 5/4 boards	Element5 Detailed Risk Assessment
3.1 HCV 1 Species diversity – boreal woodland caribou	Low risk for supply area involved in production of 5/4 boards	Element5 Detailed Risk Assessment
3.2 HCV 2 IFL	Low risk for supply area involved in production of 5/4 boards	Element5 Detailed Risk Assessment

3.3 HCV 3 Ecosystems	Low risk for Canada	FSC Canada NRA
3.4 HCV 4 Ecosystem services	Low risk for Boucher supply area in Alberta (Specified risk for Yukon and NW Territories)	FSC Canada NRA
3.5 HCV 5 Communities	Low risk for Canada	FSC Canada NRA
3.6 HCV 6 Cultural values	Low risk for Canada	FSC Canada NRA
4.1 Conversion	Low risk for supply area involved in production of 5/4 boards	Element5 Detailed Risk Assessment
5.1	Low risk for Canada	FSC Canada NRA
<b>Risk of Mixing</b>		
No indication of risk of mixing during transport of logs from forest to sawmill or sawmill to Element5		

**In all CW risk categories, information gathered demonstrates low risk of sourcing unacceptable fibre into Element5 products.**

**No indication of risk of mixing during transport of logs from forest to sawmill or sawmill to Element5.**

**5/4 lumber boards sourced from Boucher Bros Lumber is FSC Controlled Wood.**



# Appendix A - FSC Canada NRA Summary V2-0

## FSC® Controlled Wood National Risk Assessment for Canada (V2-0) Summary

Indicator	Description	Risk Designation	Control Measures Required
<b>Controlled wood category 1: Illegally harvested wood</b>			
1.1	Land tenure and management rights	Low Risk for Canada	No
1.2	Concession licenses	Low Risk for Canada	No
1.3	Management and harvesting planning	Low Risk for Canada	No
1.4	Harvesting permits	Low Risk for Canada	No
1.5	Payment of royalties and harvesting fees	Low Risk for Canada	No
1.6	Value added taxes and other sales taxes	Low Risk for Canada	No
1.7	Income and profit taxes	Low Risk for Canada	No
1.8	Timber harvesting regulations	Low Risk for Canada	No
1.9	Protected sites and species	Low Risk for Canada	No
1.10	Environmental requirements	Low Risk for Canada	No
1.11	Health and safety	Low Risk for Canada	No
1.12	Legal employment	Low Risk for Canada	No
1.13	Customary rights	Low Risk for Canada	No
1.14	Free prior and informed consent	Low Risk for Canada	No
1.15	Indigenous People's rights	Low Risk for Canada	No
1.16	Classification of species, quantities, qualities	Low Risk for Canada	No
1.17	Trade and transport	Low Risk for Canada	No
1.18	Offshore trading and transfer pricing	Low Risk for Canada	No
1.19	Custom regulations	Low Risk for Canada	No
1.20	CITES	Low Risk for Canada	No
1.21	Legislation requiring due diligence/due care procedures	Low Risk for Canada	No
<b>Controlled wood category 2: Wood harvested in violation of traditional and human rights</b>			
2.1	The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.	Low Risk for Canada	No
2.2	Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.	Low Risk for Canada	No
2.3	The rights of Indigenous and Traditional Peoples are upheld.	Specified Risk for Canada	Yes
<b>Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities</b>			
3.1	HCV 1: Species diversity.	Specified Risk for the following ecoregions: <ul style="list-style-type: none"> <li>Southern Great Lakes forest</li> <li>Eastern Great Lake lowland forest</li> <li>Central Pacific coastal forest</li> <li>Eastern Canadian forest</li> <li>New England Acadian forest</li> <li>Puget Lowland forest</li> <li>Eastern Canadian Shield taiga</li> </ul>	Yes
		<ul style="list-style-type: none"> <li>Central Canadian Shield forests</li> <li>Eastern forest-boreal transition</li> <li>Midwestern Canadian Shield forest</li> <li>Mid-Continental Canadian forests</li> <li>Southern Hudson Bay taiga</li> <li>Northern Canadian Shield taiga</li> <li>Canadian Aspen forests and parklands</li> <li>Alberta-British Columbia foothills forests</li> <li>Muskwa-Slave Lake forests</li> <li>Northwest Territories taiga</li> <li>Fraser Plateau and Basin complex</li> <li>Northern transitional alpine forests</li> <li>Central British Columbia Mountain forests</li> <li>British Columbia mainland coastal forests</li> <li>Northern Cordillera forests</li> <li>Alberta Mountain forests</li> <li>North Central Rockies forests</li> <li>Okanagan dry forests</li> </ul>	
3.2	HCV 2: Landscape-level ecosystems and mosaics.	Specified Risk for 91 IFILs identified in Table 5 of the NRA	Yes
3.3	HCV 3: Ecosystems and habitats.	Low Risk for Canada	No
3.4	HCV 4: Critical ecosystem services.	Specified Risk for Yukon and Northwest Territories	Yes
3.5	HCV 5: Community needs.	Low Risk for Canada	No
3.6	HCV 6: Cultural values	Low Risk for Canada	No
<b>Controlled wood category 4: Wood from forests being converted to plantations or non-forest use</b>			
4.1	Net conversion of natural forests to plantations or non-forest use is less than 0.02% or 5000 hectares on average for the past 5 years.	Specified Risk for the following Reconciliation Units: <ul style="list-style-type: none"> <li>RU 12 – Quebec Mixedwood Plains</li> <li>RU 34 – Alberta Boreal Plains</li> <li>RU 39 – British Columbia Boreal Plains</li> </ul>	Yes
<b>Controlled wood category 5: Wood from forests in which genetically modified trees are planted</b>			
5.1	No commercial use of genetically modified trees.	Low Risk for Canada	No