

Public Notification Letter

FSC® Chain of Custody Controlled Wood Stakeholder Consultation

To: Interested Parties

From: SCS Global Services

Consultation period: 2/19/2026 – 4/2/2026 (6 weeks)

Re: Notification of intent to audit **Cascade Pacific Pulp, LLC** against FSC Chain of Custody Controlled Wood standard FSC-STD-40-005 V3-1

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 **Cascade Pacific Pulp, LLC’s** 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.

Publicly Available Information for Organizations Certified to the FSC Controlled Wood Standard (FSC-STD-40-005)¹

Organization Name	Cascade Pacific Pulp
FSC COC Certificate Number	SCS-COC-000885/SCS-CW-000885

1. Procedure for Filing Complaints

Name of Authorized Representative / Position Responsible	Lisa Scott, Technical Manager
Contact Detail (Contact information for person or position responsible for addressing complaints)	<p>Lisa Scott Cascade Pacific Pulp 30480 American Dirve Halsey, OR 97348 lisa.scott@igic.com 541-369-1752</p>
Procedure for filing complaints	<p>Note: The complaint procedure shall indicate the <u>timelines</u> and <u>processing steps</u> when a complaint is received. For further details on complaints procedure, see section 7 in FSC-STD-40-005</p> <p>Cascade Pacific Pulp will take the following steps to address a complaint received about the company’s conformity to the FSC Chain of Custody requirements.</p> <ul style="list-style-type: none"> • Acknowledge receipt of the complaint to the complainant within five business days of receiving the complaint and forward the complaint to Zimmfor. • Complaints related to risk designations in the relevant FSC risk assessment will be forwarded to the responsible body as indicated in the NRA. • The complaint will be investigated, and corrective actions will be determined to respond to the complaint within three (3) months. If more time is needed to complete the investigation, the complainant and the organization’s certification body shall be notified. <ul style="list-style-type: none"> o If there is an issue with a supplier, notification will be made to the supplier. o If warranted, a field visit will be made to the supplier’s site. • Appropriate actions will be taken with respect to complaints and any deficiencies found in processes that affect conformity to the certification requirements. • The complainant and the organization’s certification body will be notified when the complaint is successfully addressed and closed. • The following apply if a complaint was not forwarded to a responsible body.

¹ This document is meant as guidance only, utilization of templates and guidance documents is no guarantee of conformity with FSC requirements. It is your organization’s responsibility to conform to relevant FSC requirements.

- o 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.
- o Dialogue with complainants that aims to solve complaints assessed as substantial before further actions are taken.
- o 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 to resolve the complaint, as well as how a precautionary approach will be used, shall be included with the complaint.
- o Employing a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending. This includes a description of how the precautionary approach is employed by the organization when a complaint is active. A complaint is pending if it has been considered substantial and no effective corrective action has been taken yet.
- o 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.
- o 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.
- o 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.
- o Verifying whether corrective action has been taken by suppliers and whether it is effective.
- o Excluding the relevant material and suppliers from the organization's supply chain if no corrective action is taken.
- o 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.

Recording and filing all complaints received and actions taken.

Zimmfor Procedures

When Zimmfor receives a comment or complaint related to the Risk Assessment(s), either directly or via a client CoC Representative, Zimmfor will:

- 1) Acknowledge the complaint to the complainant, if not already done so by the client CoC Representative and provide an initial response to the complainant within two weeks of the original complaint. Zimmfor will request the complainant complete the Zimmfor FSC Complaint Form and include relevant evidence to support their concern.

- 2) Conduct 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.
 - 3) Dialogue with complainant with the aim to solve complaints assessed as substantial, before further actions are taken.
 - 4) Forward substantial complaints to the Certification Body and relevant FSC National Office for the supply area within two weeks of receipt of the complaint, including information on the steps to be taken to resolve the complaint, as well as how a precautionary approach will be used.
 - 5) While substantial complaints are pending, a precautionary approach towards the continued sourcing of the relevant material will be employed, which may include:
 - ☐ considering supplies from the applicable supplier or source areas as uncontrolled, until the complaint is resolved, unless sourced as FSC certified, or
 - ☐ developing interim control measures to effectively mitigate the risk, until the complaint is resolved.
 - 6) Where verification is required to resolve a substantial complaint, a desk or field verification review (as applicable) will be conducted within two months of the initial complaint.
 - 7) Where a substantial complaint is assessed and verified as being substantial, corrective actions will be developed, as applicable (e.g., control measure revision or development, changes to sourcing areas or supply chain). Corrective actions may include steps to be taken by suppliers, as well as implementation of verification steps, to ensure conformance and efficacy.
 - 8) If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be considered a specified risk and managed accordingly.
 - 9) Upon conclusion of the complaint review and verification process, the complainant, the Certification Body, and the relevant FSC National Office will be notified of the results of the complaint and any actions taken towards its resolution. Where complaints affect Participating Clients, they will be notified accordingly.
 - 10) A complaints file will be maintained to record all complaints received, correspondence, and actions taken.
- Zimmfor Complaints and Contact Information
- Complaints related to the DDS should be forwarded to the Zimmfor FSC Risk Assessment Manager at FSC.DDS@zimmfor.com
- All complaints and comments received related to the Zimmfor DDS will be managed consistent with the FSC CW Standard (40-005 v3-1, Section 7).
- Complaints/comments must note the applicable client, state/province, FSC CW category and any applicable evidence to support the complaint/comment.

	Complaints related to the FSC US National Risk Assessment should be forwarded to FSC US at info@us.fsc.org or via the FSC US website at https://us.fsc.org/en-us .
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2. Summary of Organization’s Due Diligence System

<p>Information regarding an organization’s due diligence system must be made publically available. This publically available information may be provided within this summary document, or as separate documentation. Please selection an option below.</p>
<p><input type="checkbox"/> DDS Summary is provided in a separate Annex. Provide name of document or summary location: (e.g. <i>http://www.xxcompany.com/dds</i> or <i>Annex XXX., written summary of DDS XXX</i>)</p>
<p><input checked="" type="checkbox"/> DDS summary is provided in this document. Complete sections 3 through 8.</p>

3. Description of the Supply Area(s) and Respective Risk Designation(s)

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
Oregon, United States	Category 1	Low Risk	<input checked="" type="checkbox"/> FSC risk assessment <input type="checkbox"/> Extended Company Risk Assessment ²	FSC -NRA-USA V1-0
	Category 2	Low Risk		
	Category 3	Specified Risk		
	Category 4	Specified Risk		
	Category 5	Low Risk		

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
Washington, United States	Category 1	Low Risk	<input checked="" type="checkbox"/> FSC risk assessment <input type="checkbox"/> Extended Company Risk Assessment	FSC -NRA-USA V1-0
	Category 2	Low Risk		
	Category 3	Specified Risk		
	Category 4	Specified Risk		
	Category 5	Low Risk		

NOTE:

- The description of the supply area should allow the identification of the area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category.
- The risk designation provided in the table is the designation provided by the risk assessment PRIOR to the application of control measures.

Please copy and paste tables to insert more source area(s) as needed.

4. Description of the Supply Chain Risk Assessment and Respective Risk Designation(s)

Supply chain sourcing area / Supply chain actor	Description of Risk Assessment	Risk Level (Low/Specified)

² If an organization is using an Extended Company Risk Assessment, the ECRA must also be submitted with this public summary.

	(risk of mixing material with non-eligible inputs in the supply chain/s during transport, processing, and storage)	
Controlled Wood Category 3-High Conservation Values-HCV1-Klamath-Siskiyou and HCV3-Old Growth	<p>Cascade Pacific Pulp has contracts with wood material suppliers on a quarterly basis. The mill takes ownership of the material when the material has arrived at the facility and added to the wood piles. All trucks entering the facility drive through the scales and then off load the material in the appropriate location. The loads are tracked through the WARP system. The amount of wood received is updated for FSC on a monthly basis after the moisture content of the wood has been determined. The material sourced is non-FSC-certified virgin material for use in FSC product groups as controlled material shall conform to the requirements of FSC-STD-40-005. Cascade Pacific Pulp ensures segregation of all material into the appropriate locations in the chip yard.</p> <p>Residual wood chip and sawdust entering the mill will be received at the No. 1 (Main) Truck Unloading or at the No. 3 Truck Unloading (Phelps). The No. 2 Truck Unloading is used when the No. 3 Truck Unloading is out of service. The chips are either unloaded into the mixed chip pile, Douglas fir pile or the cedar pile. Sawdust is conveyed on the belt from No. 3 Truck Unloading onto the sawdust pile located at the far east of the facility.</p> <p>Suppliers provide declarations for locations of material received at their facilities. Suppliers are committed to legally harvesting for their mills.</p>	Low Risk
Controlled Wood-Risk of Mixing (3.5)	<p>From Zimmfor's FSC Due Diligence Summary USA September 2024, there should be no risk of mixing with non-eligible inputs based on the following:</p> <ol style="list-style-type: none"> 1) Cascade Pacific Pulp's review of the Supplier declarations, knowledge of the area and facilities, contractual agreements 2) Due Diligence Audit is reviewed by Cascade Pacific Pulp to ensure there are no gaps in Zimmfor DDS. 3) Since the areas Cascade Pacific sources material from (Oregon and Washington) are covered by Zimmfor's DDS, supplier declarations, and contractual agreements are in place, the risk of mixing would be low or no risk . 	Low Risk
Controlled Wood Category 4-Conversion	Cascade Pacific Pulp has contracts with wood material suppliers on a quarterly basis. The mill takes	Low Risk

	<p>ownership of the material when the material has arrived at the facility and is added to the chip or sawdust storage piles. All trucks entering the facility drive through the scales and then off load the material in the appropriate location. The loads are tracked through the WARP system. The amount of wood received is updated for FSC on a monthly basis after the moisture content of the wood has been determined. The material sourced is non-FSC-certified virgin material for use in FSC product groups as controlled material and shall conform to the requirements of FSC-STD-40-005.</p> <p>Cascade Pacific Pulp ensures segregation of all material into the appropriate locations in the chip yard.</p> <p>Residual wood chip and sawdust entering the mill will be received at the No. 1 (Main) Truck Unloading or at the No. 3 Truck Unloading (Phelps). The No. 2 Truck Unloading is used when the No. 3 Truck Unloading is out of service. The chips are stored in 4 different piles north, south, east or west. Piles are rotated to age the chips. The oldest pile is used first. Sawdust is conveyed on the belt from No. 3 Truck Unloading onto the sawdust pile located at the far east of the facility. There are 3 storage piles for the sawdust north, south, and west. The oldest pile is used first.</p>	
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5. Control Measures Implemented by the Organization

Not Applicable - All risk designations from the supply area risk assessments and supply chain risk assessments are low risk. Skip to section 6.

Sourcing Area/Supply chain area	Indicator with specified risk	Description of Control measure
Controlled Wood Category 3-High Conservation Values-HCV1-Klamath-Siskiyou and HCV 3-Rare Ecosystems-Old Growth Forest	HCV-Species Diversity	<p>Cascade Pacific Pulp uses Supplier Declarations to provide information and verify that the fiber is not sourced out of the Klamath Siskiyou. The mill cannot use the fiber sourced from southern oregon as most of it is pine. The mill does not source material from California. Suppliers that have declared to receive material from the Klamath county also have certifications to ensure the fiber is legally harvested.</p> <p>Zimmfor FSC-Due Diligence System (DDS) Summary USA</p> <p>1) Zimmfor used the Control Measures in the NRA to mitigate risk (i.e., attend the Regional Meetings and implement Mitigation</p>

		<p>Options). Zimmfor attended all three CW Regional Meetings held in 2018.</p> <p>2) For all specified risks and source areas, the Education and Outreach Mitigation Options (MO) was selected, in conjunction with providing staff/ forester training (for Participating Clients, sub-suppliers, landowners, and forest managers). The education options have been presented to suppliers at multiple levels via weblinks, in person interviews with client suppliers, land managers, log buyers in the supply chain, and land owners</p> <p>3) To our knowledge, no clients source from the Specified Risk Area for the Lesser Slender Salamander in California. For all other Specified Risks identified in the NRA, Zimmfor clients source from within the states indicated in the Participating Client list in the DDS Summary (attached). All listed clients may potentially source from within the Specified Risk Areas within any listed state, based on the fact that mixing within the supply chain is highly likely.</p> <p>4) A general description of our Education and Outreach Process is as follows (see the DDS Summary and Supplement for more details):</p> <ul style="list-style-type: none"> a. Zimmfor developed an on-line platform, as well as physical training materials for all of the Specified Risks identified within the NRA. The materials were broken into “regional courses/ brochures”, for CH sourcing in the West, East and South. b. These materials were pushed out to suppliers by CHs during their information gathering stage of the DDS implementation, typically via a “supplier declaration” process. c. Supplier and staff were invited to complete the training courses. <p>Zimmfor also completed a field component of the Education and Outreach MO, making forest site visits to a sample of states and counties that were identified as Specified Risk in the NRA. The purpose of the field visits was to provide a second effort in bringing the Education and Outreach materials to forest owners, managers, loggers and procurement staff. The course material was reviewed on site with attending staff. While on site, Zimmfor also reviewed the presence/ absence of the identified Specified Risk(s), as well as implementation of any Best Management Practices, forest management planning, reforestation efforts, and related considerations.</p> <p>Attached is the documentation.</p>
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Sourcing Area	Indicator with specified risk	Description of Control measure
Controlled Wood Category 4-Conversion	Specific Counties as	CW Category 4-Conversion-Implementation of CM 4.1 or 4.2 is mandatory. Zimmfor DDS utilizes CM 4.2, which consists of two

	Indicated by FSC	<p>parts (both Mandatory), 4.2 a) CW Regional Meetings, and 4.2b) implementation of mitigation options.</p> <p>Zimmfor also completed a field component of the Education and Outreach MO, making forest site visits to a sample of states and counties that were identified as Specified Risk in the NRA. The purpose of the field visits was to provide a second effort in bringing the Education and Outreach materials to forest owners, managers, loggers and CH procurement staff. The physical MO course material was reviewed on site with attending staff. While on site, Zimmfor also reviewed the presence/ absence of the identified Specified Risk(s), as well as implementation of any Best Management Practices, forest management planning, reforestation efforts, and related considerations.</p> <p>See page 5 and 6 of attached documents.</p>
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Note: Please copy and paste additional tables as needed.

6. Stakeholder Consultation Summary

Not Applicable - The organization did not engage in a formal stakeholder consultation process. Skip to section 7.

<p>The areas for which the stakeholder consultation has been conducted (e.g. geo-reference data, state, province, supply unit)</p>	<p>(e.g. geo-reference data, state, province, supply unit) FSC</p>	
<p>Stakeholder engagement date(s):</p>		
<p>Means of Contact, please check all that apply</p>		
<p><input type="checkbox"/> Face to face meetings</p> <p><input type="checkbox"/> Personal contacts by phone</p> <p><input type="checkbox"/> Email, or letter</p> <p><input type="checkbox"/> Notice published in the national and/or local press</p>	<p><input type="checkbox"/> Notice published on relevant websites</p> <p><input type="checkbox"/> Local radio announcements</p> <p><input type="checkbox"/> Local customary notice boards</p> <p><input type="checkbox"/> Social media broadcast</p>	
<p>List of the stakeholder groups invited by the organization to participate in the consultation, please check all that apply</p>		
<p><input type="checkbox"/> Economic interests</p> <p><input type="checkbox"/> Social interests</p> <p><input type="checkbox"/> Environmental interests</p> <p><input type="checkbox"/> FSC-accredited certification bodies active in the country</p> <p><input type="checkbox"/> National and state forest agencies</p>	<p><input type="checkbox"/> Experts with expertise in controlled wood categories</p> <p><input type="checkbox"/> Research institutions and universities</p> <p><input type="checkbox"/> FSC regional offices, FSC network partners, registered standard development groups and NRA working groups in the region</p>	
<p>Summary of the stakeholder comments received and considerations</p>		
<p>Stakeholder comment</p>		
<p>Consideration</p>		
<p>Stakeholder comment</p>		
<p>Consideration</p>		

The organization’s justification for concluding that the material sourced from these areas can be used as controlled material or sold with the FSC Controlled Wood claim

Note: Comments shall only be published with prior consent from the consulted stakeholder and not associated with stakeholder’s personal identifiable information.

7. Expert Engagement Summary

Not Applicable - The organization did not engage experts in the development of control measures. Skip to section 8.

Expert A	
Qualification	Zimmfor Management Services, LTD-Work conducted by Registered Professional Foresters
Scope of Service	<p>Cascade Pacific Pulp has contracted with Zimmfor Management Services Ltd to support the requirements of the FSC-STD-40-005 V3-1 EN Requirements for Sourcing FSC Controlled Wood.</p> <p>Zimmfor will complete the tasks necessary to illustrate implementation and conformance to the FSC USA NRA.</p> <ol style="list-style-type: none"> 1) FSC US Regional Meetings – evidence of attend all three meetings; evidence can be provided (where requested by the CB) to illustrate our attendance on behalf of Zimmfor DDS participant. 2) Updated on-line Supplier Declaration (SD) – consistent with current Zimmfor DDS participant sources. SD submission summaries can be provided to support external audits. 3) Updated Due Diligence System (DDS) Summary – a DDS Summary consistent with FSC requirements.. 4) Education/Outreach Packages + Best Management Practices (online web version) – online Education/Outreach Packages for the “Western and Eastern US”; evidence of educating (i.e., training) to be provided at a minimum annual, semi-annually or as requested by Zimmfor DDS participant to support external audits. 5) Field Verifications – site visits for (sample basis) of “suppliers” (land owners, forest managers, etc.) based on state/county with identified risk factors; verification reports provided via an online link; field verifications relate to implementing the Education/Outreach Packages (these are completed annually, similar to other FSC audits). 6) External Audit support 7) Updated Extended Company-based Risk Assessment for Alaska, and associated DDS Summary.

Expert B	
Qualification	
Scope of Service	

NOTE: For individual experts this includes the experts’ qualifications and the scope of their services. The personal identifiable information such as names of experts, their license/registration numbers (if applicable) shall only be included with given consent from experts. For publicly available expertise, the specific sources of information shall be cited.

Note: Please copy and paste additional tables as needed.

8. Field Verification Summary

Not Applicable - The organization did not conduct field verification as a control measure.

Findings from field verification	
Steps taken by the organization to address identified non-conformities	

Findings from field verification	
Steps taken by the organization to address identified non-conformities	

Note: Please copy and paste additional tables as needed.

The confidential nature of the information may be determined by the legislation that the organization must comply with. Commercially sensitive information, and the names of individual landholders, shall be treated as confidential information.	
<input type="checkbox"/> Not Applicable - The organization has not excluded confidential information.	
The organization's justification for the exclusion of confidential information.	