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Public Notification Letter

FSC® Chain of Custody Controlled Wood Stakeholder Consultation

To: Interested Parties
From: SCS Global Services
Consultation period: 11/2/22 – 12/14/22

Re: Notification of intent to audit Green Diamond Resource Company 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 Green Diamond Resource Company 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:

FSC Public Certificate Search | FSC Connect

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

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 by 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 and www.scsglobalservices.com.

Publicly Available Information for FSC Controlled Wood Certificate Holders

INSTRUCTIONS

FSC® requires that organizations track their controlled material and publish specific findings. This form helps you meet the requirements in Section 6 of FSC-STD-40-005 V3-1 "Publicly Available Information".¹

Organization Name	Green Diamond Resource Company (Samoa Chipping Facility and Fairhaven Chip Export Facility, Multi-Site)		
FSC COC Certificate Number	SCS-COC-004486		
Name of Authorized Representative (Contact information for person or position responsible for addressing complaints)	Pat McNeil 900 Riverside Rd Korbel, CA 95550 (707) 668-4406 pmcneil@greendiamond.com		
Procedure for filing complaints Note: for further details on complaints procedure, see section 7 in FSC-STD-40- 005 V3-1	Any complaints in regards to FSC Controlled Wood and or our Due Diligence System are directed to FSC Coordinator, Pat McNeil. Complaints can be made by phone, email, or in writing via U.S.mail. A company email account has been set up for filling any FSC related complaints: gdrcofscinfo@greendiamond.com This email address can also be found on the company website at https://greendiamond.com/responsible-forestry/certification/FSC/ As per FSC-STD-40-004 V3-0 (Clause 7.2), Green Diamond will use the following procedures to handle any FSC related complaints: a) Any complaint that is received related to FSC Controlled Wood, our FSC Risk Assessment, or Due Diligence System will be acknowledged and documented (kept on file) by Green Diamond's FSC Coordinator; b) Green Diamond will inform any complainant of the complaint procedure, and provide an initial response to all complainants within a time period of two (2) weeks c) Any complaint related to risk designations in Green Diamond's FSC risk assessment, Due Diligence System, or publically available Controlled Wood Summary will be forwarded to our certification body (SCS Global Services). d) Green Diamond will conduct a preliminary assessment for determining whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided		

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.

- against the risk of using material from unacceptable sources;
- e) Green Diamond will create dialogue with any complainants that aims to solve complaints assessed as substantial before further actions are taken;
- f) Green Diamond will forward any 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 Green Diamond in order to resolve the complaint, as well as how a precautionary approach will be used, will be included with the complaint;
- g) Green Diamond will employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending. Green Diamond will document a description of how the precautionary approach was employed when a complaint is active (pending).
- h) Green Diamond will implement a verification process (e.g. field verification and/or desk verification) for a complaint assessed as substantial by the organization, within two (2) months of their receipt;
- i) Green Diamond will determine 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 will be excluded.
- j) Green Diamond will verify and document whether the appropriate corrective action has been taken by suppliers and whether it is effective;
- k) Green Diamond will exclude the relevant material located on site and will exclude future material for supplier if no corrective action is taken;
- I) Green Diamond will inform 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 maintain copies of relevant correspondence;
- m) Green Diamond will record and file all complaints received and actions taken.

Risk Assessment Summary

assessment.						
Description of Supply Area	California and Oregon					
	FSC US Controlled Wood National Risk Assessment					
Applicable FSC Risk Assessment	n/a, no FSC Risk Assessment currently available for supply area					
Submit applicable risk assessment (excluding confidential information) in a separate document						
Risk Designations Summary For any category not rated as "Low" please fill in control measures by risk assessment indicator		Sub-category				
In order to select a checkbox, "d	ouble-click" on the box, and select	default v	alue as "checked".			
Overall Risk Designation for the Supply Area		☐ Un/specified (see below for unspecified risk designations) ☐ Low				
Illegally harvested wood		1.1	☐ Un/specified ⊠ Low			
Overall Risk Designation: $\ \square$ Unspecified $\ \boxtimes$ Low		1.2	Un/specified 🔀 Low			
Control Measures per indicator (if applicable)		1.3	Un/specified \(\subseteq \text{Low} \)			
		1.4	Un/specified \(\subseteq \text{Low} \)			
		1.5	Specified Low			
		1.6	Specified Low			
		1.7	☐ Specified ☐ Low ☐ Specified ☐ Low			
		1.8 1.9	☐ Specified ☐ Low ☐ Specified ☐ Low			
		1.10	Specified Low			
		1.11	Specified Low			
		1.12	Specified Substitution Low			
		1.13	Specified Substitution Low			
		1.14	Specified X Low			
		1.15	Specified			
		1.16	Specified X Low			
		1.17	Specified Now			
		1.18	Specified Now			
		1.19	Specified			
*Indicator 1.5 to 1.21 only applicab	_	1.20	Specified Low			
(Centralized) National Risk Assessm		1.21	Specified			
2. Wood harvested in violation of traditional and human rights		2.1	Un/specified \(\subseteq \text{Low} \)			
Overall Risk Designation: Unspecified \(\subseteq \text{Low} \)		2.2	Un/specified 🛚 Low			
Control Measures per indicator (if applicable)		2.3	☐ Un/specified ⊠ Low			
		2.4	\square Unspecified $igotimes$ Low			
*Indicator 2.4 and 2.5 only applicab Risk Assessment	ole when using Company	2.5	☐ Unspecified ☑ Low			
3. Wood harvested from forests in wh	ich high conservation	3.0	☐ Specified ☐ Low			
values are threatened by managem		3.1	Specified Low			
•	ecified 🛛 Low	3.2	Un/specified \(\subseteq \text{Low} \)			
Control Measures per indicator (if a	nnlicahla)	2 2	Specified Dlow			

As cont	As control measures for indicators 3.1 and 3.3: Green		Specified	⊠ Low
Diamor	d verifies the origin of all logs that we purchase. If any	3.5	Specified	igwedge Low
of our s	uppliers source uncertified materials from within a			
specifie	d risk area (as identified by FSC), Green Diamond will			
educate	e the suppliers about the conservation values of the			
HCV, th	reats from incompatible forest management (as			
describ	ed in the FSC US National Risk Assessment), and			
opporti	unities for conservation through management that	3.6	Specified	oxtimes Low
enhanc	es the HCV and reduces or eliminates these threats.			
*Indica	tor 3.0 <u>and</u> 3.3 to 3.6 only applicable when using FSC			
(Centra	lized) National Risk Assessments			
4. Wood h	narvested from areas being converted from forests and			
other w	other wooded ecosystems to plantations or non-forest uses		☐ Un/Specified ⊠ Low	
Control	Measures (if applicable)	7.1	4.1 ☐ Un/Specified ☐ Low	
N/A				
5. Wood h	narvested from forests in which genetically modified			
trees ar	trees are planted		☐ Un/Specified ☐ Low	
Control	Measures (if applicable)	5.1	5.1 Un/Specified 🛛 Low	
N/A				

Stakeholder Consultation Summary

Summary of the consultation process(es) performed according to Annex B of FSC-STD-40-005 V3-1

Stakeholder Consultation for the 5-year recertification audit conducted by SCS Global Services

Expert Engagement Summary

N/A No expert engagement conducted

Information on the engagement of one or more experts in the development of control measures in accordance with Annex C of FSC-STD-40-005 V3-1

Note: For individual experts this includes the names of the experts, their qualifications, their license/registration number (if applicable), and the scope of their services. For publically available expertise, the specific sources of information shall be cited.

In 2019, Green Diamond hired Zimmfor Management Services Ltd. (Zimmfor) to develop an online course to provide education/outreach material that cover the issues identified by FSC for sourcing wood products from within specified risk areas in California and Oregon. Zimmfor offers consulting services to the resource sector, with a focus on certification support related to forest management, Lacey Act due care programs, and chain of custody (COC) for wood and wood fiber products. The education/outreach material provided by Zimmfor was sent to all of our suppliers (that may source wood products from within a specified risk area). Supplier completion of this course can be tracked by Green Diamond.

Summary of Field Verification

(undertaken as a control measure)

A summary of the organization's findings from field verification undertaken as a control measure, and steps taken by the organization to address identified non conformities where they occurred, unless confidential. The organization shall provide a justification for the exclusion of confidential information.

Note: The confidential nature of the information may be determined by the legislation that the organization must be in compliance with. Commercially sensitive information, and the names of individual landholders may be treated as confidential.

Green Diamond's Log Sales and Chip Facility Manager conducts field visits to various suppliers. No non-conformities were identified during the course of any of these field visits.