



Public Summary Due Diligence System (DDS)

Organisation name	Structurlam Mass Timber Corporation (SMTC)
Location	2176 Government Street, Penticton, British Columbia, Canada
FSC certificate code	CoC/CW Certificate Code (SCS-COC-005918)
Contact person	Caitlin MacNeil, CoC Administrator
Prepared / assisted by	The DDS was developed by SMTC staff with the support of an external consultant specializing in risk assessments, chain of custody, sustainable forest management certification systems.
National Risk Assessment	FSC-NRA-CAN V2-0
Date updated	11-22-2020

Scope & Purpose

Structurlam Mass Timber Corporation (SMTC) is a Mass Timber manufacturer with several locations in the South Okanagan, British Columbia. SMTC produces Engineered Glue Laminated Wood Beams (Glulam) and Cross Laminated Wood Panels (Crosslam/CLT) using certified dimensional lumber, in certain instances we need to use controlled material.

STRUCTURLAM is certified under FSC Chain of Custody and FSC Controlled Wood Certification. SMTC is implementing a Due Diligence System (DDS) to maintain conformance with the Forest Stewardship Council® (FSC®) Standard (FSC STD-40-005 V3.1) – Company Evaluation of Controlled Wood in order to avoid material from unacceptable sources. SMTC’s Purchase Program relies on our DDS to evaluate our lumber supply and ensure we avoid material from unacceptable sources. The purpose of the Public Summary is to present our DDS.

Risk of Mixing in the Supply Chain

As indicated in Table 1: Nature of Supply Chain in SMTC Supply Area, STRUCTURLAM has a 1- or 2-Tier supply chain, procuring lumber directly from the supplier’s sawmill. There is negligible risk of mixing with non-eligible material in this simple supply chain during transport, processing, or storage because we control material from the supply area as defined in the DDS.

Table 1: Nature of Supply Chain in SMTC Supply Area

Nature of Supply Chain			
Supplier Type	Primary Producer & Forest Manager	Material Type (Product Classification)	Dimensional Lumber (W6.1)
# Suppliers	4 Companies (up to 18 Mills)	Species	Spruce-Pine-Fir (SPF)
Approx. # Sub-suppliers	10 – 50/supplier	Ave. # of Tiers of Supply Chain	1-2
Supply Chain	SMTC purchases lumber from primary manufacturer (sawmill) sourcing roundwood from forest via their tenure or purchased roundwood from sub-supplier.		

Risk for Origin of material

The FSC-NRA-CAN V2-0 National Risk Assessment (NRA) was applied to SMTC’s DDS. Relevant Ecoregions are listed in Table 2: Ecoregions in the Supply Area. Risks and the applicable geographic location for CW Categories and Indicators are provided in Table 3: Risk Designation Summary.

Table 2: Ecoregions in the Supply Area

Ecoregion Number & Name		Ecoregion Number & Name	
NA50502	Alberta-British Columbia Foothills Forests	NA50518	North Central Rockies Forests
NA50501	Alberta Mountain Forests	NA50613	Northern Cordillera Forests
NA50506	British Columbia Mainland Coastal Forests	NA50521	Northern Transitional Alpine Forests
NA50502	Canadian Aspen Forests and Parklands	NA50522	Okanagan Dry Forests
NA50507	Cascade Mountains Leeward Forests	NA51117	Pacific Coastal Mountains Icefields & Tundra
NA50509	Central British Columbia Mountain Forests	NA50813	Palouse Grasslands
NA50514	Fraser Plateau & Basin Complex	NA50524	Puget Lowland Forests
NA50610	Muskwa-Slave Lake Forests		

SMTC reserves the right to exclude material that cannot be confirmed as low risk from its supply chains.

Table 3: Risk Designation Summary for Supply Area

Supply Area	Controlled Wood	
	Category & Indicator	Risk Designation
Province of British Columbia	Category 1 – Illegally Harvested Wood	
	1.1 – 1.21 – Illegally Harvested Wood	Low Risk
	Category 2 – Wood harvested in violations of traditional and human rights	
	Indicator 2.1 – Violent Arms Conflict	Low Risk
	Indicator 2.2. – Violation of Labour Rights	Low Risk
	Indicator 2.3 – Violation of Indigenous & Traditional Peoples Rights	Specified Risk
Alberta-British Columbia Foothills Forests Alberta Mountain Forests British Columbia Mainline Coastal Forests Canadian Aspen Forests and Parklands Cascade Mountains Leeward Forests Central British Columbia Mountain Forests Fraser Plateau & Basin Complex Muskwa-Slave Lake Forests North Central Rockies Forests Northern Cordillera Forests Northern Transitional Alpine Forests Okanagan Dry Forests	Category 3 – Wood from forest in which high conservation values are threatened by management activities	
	Indicator 3.1 (HCV1) – Species Diversity – Woodland Caribou Critical Habitat	Specified Risk
IFL#108, IFL#116, IFL#118, IFL#126, IFL#131, IFL#134, IFL#136, IFL#145, IFL#149, IFL#156_1, IFL#156_2, IFL#169, IFL#171, IFL#176, IFL#190 IFL#213, IFL#235, IFL#237, IFL#241, IFL#243, IFL#247, IFL#249, IFL#251, IFL#274, IFL#284, IFL#286, IFL#295, IFL#298	Indicator 3.2 (HCV2) – Landscape-level Ecosystems and Mosaics – Intact Landscape Forests	Specified Risk
Province of British Columbia	Indicator 3.3. (HCV3) – Ecosystems and Habitats	Low Risk
	Indicator 3.4. (HCV4) – Critical Ecosystem Services	
	Indicator 3.5. (HCV5) – Community Needs	
	Indicator 3.6. (HCV6) – Cultural Values	
British Columbia Boreal Plains Ecozone (RU 39)	Category 4 – Wood from forests being converted to plantations or non-forest use	
	Indicator 4.1 – Conversion to plantation or non-forest use	Specified Risk
Province of British Columbia	Category 5 – Wood from forests in which genetically modified trees are planted	
	Indicator 5.1 – Genetically modified trees	Low Risk

Table 4: Control Measures for Specified Risk Categories

Resp	#	Control Measure
Category 2 – Wood harvested in violations of traditional and human rights		
Indicator 2.3 – Rights of Indigenous and Traditional Peoples Upheld		
Supplier	CM#1	Evidence demonstrates that Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose the Forest Management Plan.
	CM#4	Evidence demonstrates that best efforts to engage with Indigenous Peoples with legal and customary rights within the Forest Management Unit to understand if/how these rights are violated as a result of forest management activities, is demonstrated.
SMTC	CM#5	A dispute resolution process is established specifically to address issues arising from violations of the right of Indigenous People related to forest management activities. The dispute resolution process is implemented in the event a dispute of substantial magnitude arises with the supply area.
Category 3 – Wood from forest in which high conservation values are threatened by management activities		
Indicator 3.1 (HCV1) – Species Diversity – Woodland Caribou Critical Habitat		
Supplier	CM#1	Evidence demonstrates that: <ul style="list-style-type: none"> - harvesting does not take place in critical habitats for Specified Risk species identified; OR - harvesting activities are consistent with the federally-approved Action Plan or Range Plan; OR - harvesting is permitted through SARA (section 73 permit).
	CM#8	Evidence demonstrates that forests in the sourcing area have a management plan that contributes to the recovery of woodland caribou critical habitat, as identified in the Federal Recovery Strategy. The management plan identifies and implements: <ol style="list-style-type: none"> a) Best Management Practices (BMPs) that reduce disturbance to and restore critical habitat including, but not limited to: <ul style="list-style-type: none"> - access management (e.g. road decommissioning, integrated access plans, restoration of linear features); OR - aggregate harvesting (i.e. harvest scheduling to minimize disturbance footprint). <p style="text-align: center;">OR</p> b) Harvest deferrals, set asides, and/or protection areas within areas of critical habitat, where forest operations are not permitted. <p>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 requirements in the Federal Recovery Strategy.</p>
SMTC	CM#9	The Organization implements a strategy to reduce sourcing over the next 5 years from areas of woodland caribou critical habitat where management plans do not meet the Federal Recovery Strategy. AND The Organization acts within their sphere of influence to publicly advocate to the relevant decision makers at the government level and other relevant forest industry partners about the need to finalize and implement legal requirements that meet the Federal Recovery Strategy.

Resp	#	Control Measure
Indicator 3.2 (HCV2) – Landscape-level Ecosystems and Mosaics – Intact Landscape Forests (IFL)		
Supplier	CM#1	Evidence demonstrates that forest operations do not occur within IFLs.
	CM#2	Evidence demonstrates that forest operations do not reduce an IFL below 50,000 ha, AND all meet applicable options below: <ul style="list-style-type: none"> a) For an IFL between 50,000 and 62,500 ha, cumulative impacts forest operations do not affect more than 10% of the IFL. b) For an IFL between 62,501 and 75,000 ha, cumulative impacts forest operations do not affect more than 20% of the IFL. c) For an IFL between 75,001 and 200,000 ha, cumulative impacts forest operations do not affect more than 30% of the IFL. d) For an IFL between 200,001 and 500,000 ha, cumulative impacts forest operations do not affect more than 35% of the IFL. e) For an IFL larger than 500,001 ha, cumulative impacts forest operations do not affect more than 45% of the IFL.
	CM#5	Evidence demonstrates that a minimum of 80% of the IFL is not threatened ¹ by forest management operations in the long-term ² . AND The cumulative impacts of forest harvesting will not reduce the IFL to below 50,000 ha.
SMTC	CM#7	The Organization implements a strategy to continually and progressively reduce sourcing over the next 5 years from IFLs. AND The Organization acts within their sphere of influence to publicly advocate for the management and enhancement of HCV2 values to relevant decision makers at the government level and other relevant forest industry partners.
Category 4 – Wood from forests being converted to plantations or non-forest use		
Indicator 4.1 – Conversion to plantation or non-forest use		
Supplier	CM#1	Evidence demonstrates that supplied material does not originate from areas converted to non-forest.
	CM#2	Evidence demonstrates that supplied material originates from acceptable sources of conversion, including: <ul style="list-style-type: none"> - Conversion that results in conservation benefits (e.g. ecological restoration, species at risk protection) - Publicly approved changes in zoning within urban areas.
	CM#3	The Organization demonstrates support for existing integrated land management processes designed to reduce the cumulative impact of changes to non-forest landscapes.
SMTC	CM#4	The Organization raises the profile of deforestation in the region and advocates for options to reduce conversion rates (e.g. afforestation policies, incentives for conservation and no net deforestation policies).

Stakeholder Consultation

Stakeholder consultation as described in FSC-40-005 v3-1, Annex B was not required as SMTC is implementing FSC-NRA-CAN control measures.

Technical Experts

Technical experts as described in FSC-40-005 v3-1, Annex C was not required as SMTC is implementing FSC-NRA-CAN control measures.

Procedure for Filing Complaints

Our procedure to handle comments and complaints from stakeholders related to our DDS consists of the following steps and will be completed within two weeks of receiving the initial complaint. We will:

- Acknowledge receipt of the complaint.
- Inform complainants of our procedure and provide an initial response within two weeks.
- Conduct a preliminary assessment to determine the substance of any comment or complaint by assessing the evidence provided against the risk of using material from unacceptable sources. Based on this assessment, we will classify a given complaint is “substantial” or “not substantial.”
- Engage in dialog with complainants to try to solve substantial complaints before further actions are taken.
- Forward substantial complainants to our certification body and FSC Canada or US within two weeks of receipt of the complaint. We will include information on the steps we will take to resolve the complaint, as well as how we use a precautionary approach.
- Employ a precautionary approach towards the continued sourcing of the relevant material while the complaint is pending.
- Implement a desk or field verification to verify the complaint within two months of its receipt.
- For substantial complaints, determine a corrective action to be taken by our suppliers and the means to enforce its implementation. If a correction action cannot be determined and/or enforced, we will exclude relevant material and/or supplier.
- Verify whether corrective action has been taken by suppliers and whether it is effective.
- Inform the complainant, our certification body, and FSC Canada or US of the results of the complaint and actions taken towards its resolution and for maintaining copies of the relevant correspondence.
- Record and file all complaints received and actions taken.

Complaints are to be addressed to:	
Contact person	Caitlin MacNeil
Position	CoC Administrator
Address	2176 Government Street, Penticton, British Columbia, V2A 8B5 Canada
Email	cmacneil@structurlam.com
Phone	(250) 492-8912