



**Bureau Veritas Certification
North America, Inc.
SFI Forest Management Audit Report**

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PQC Code	E01E
Contract Number	US2976180

Certification Audit:		Re-Certification Audit:		Surveillance Audit:	#4	Scope extension audit:	
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Audit Summary

Introduction

This report summarizes the results of the fourth surveillance audit conducted on Weyerhaeuser's United States SFI program for forest management. The audit was conducted by Mr. Richard Boitnott, Bureau Veritas Certification lead auditor. Mr. Boitnott is an SAF certified forester, a Texas accredited forester, and has wildlife management expertise. He worked for forest industry for 22 years in a variety of forestry and wildlife management positions before beginning his auditing career over 18 years ago.

Audit Scope, Objectives and Process

The scope of this audit is "forest management". The audit was conducted against the SFI 2015-2019 Standard Forest Management Edition. All SFI Objectives were covered during the audit except for Objective 13. There was no substitution or modification of indicators. Specifically, two objectives of the SFI audit were to verify that the Program Participant's SFI Program is in conformance with the SFI Objectives, Performance Measures, and Indicators, and any additional indicators that the Program Participant chooses, and verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground. Standard Bureau Veritas Certification protocols and forms were applied throughout the audit as provided by the most recent version of the Bureau Veritas Certification SFI Auditor Handbook available on the auditor access website.

Audit Plan

An audit of the corporate function of the company's forest management system was conducted on March 10th, 2020 in conjunction with a corporate review of the company's fiber sourcing, chain of custody, and certified sourcing label use audits. A one-day document review was conducted August 10th on the Western Timberlands region level, including South Oregon area reviews. An audit of the three forest areas within the South Oregon region was conducted August 11th through the 14th; one day on the Coquille forest area, one day on Coos Bay, and two days on South Valley. An audit of the Coastal Georgia forest area was conducted for 2 ½ days October 5th and the 7th through the 8th, with ½ day spent on region review on the 5th followed by field visits the 7th and 8th. A closing meeting of the entire surveillance audit process was conducted at 2:00 pm CDT via conference call on the 9th. An audit plan was developed and is on file with Bureau Veritas Certification

Company Information

Weyerhaeuser is a forest management company, managing approximately 12.2 million acres of timberlands throughout the United States, and slightly less than 14 million in Canada. The company is based in Seattle, Washington.

The Western Timberlands portion of this audit process consists of approximately 3 million acres of land in Washington and Oregon. This audit was focused on the 523,00 acres in the South Oregon region. This region is headquartered in Springfield, Oregon. It consists of three forest areas. Coquille and Coos Bay are closer to the coasts, while the South Valley forest area is located in the Willamette valley. Land within this region consists of a coniferous forest typical of the Pacific Northwest; primary species being Douglas-fir and Western hemlock, with Western red cedar, Red alder, Sitka spruce, Noble fir, White fir and Grand fir also present. The company regenerates its forest using clearcutting, followed by chemical site preparation where necessary, and artificial regeneration. Douglas fir is the primary species used in the company's reforestation program. A forest practices act (FPA) is in place in Oregon that proscribes many activities that support the company's SFI program. Riparian protection is heavily regulated and monitored by state agency stewardship foresters. Wildlife management practices are also regulated, with the amount of standing retention and downed woody debris also prescribed by the FPA.

The Southern Timberlands consists of over 7 million acres of land in the Eastern United States. This audit was focused on the 310,000 acres in the Coastal Georgia area, part of the 888,000 acre Atlantic region. Land within the Coastal Georgia area is typical of a southeastern U.S. coastal plain forest, consisting primarily of loblolly pine flatwoods. There are few active stream courses. Most of the sites are somewhat to poorly drained. Sites are regenerated using clearcutting followed generally by bedding, chemical site preparation, and planting, although some "higher" sites are not bedded. The primary species used in its regeneration program is loblolly pine, although slash pine is established on appropriate sites.

Multi-Site Requirements

The company maintains a multi-site certification now consisting of 39 forest areas. Headquarters of the management system is in Seattle Washington. The company qualifies for multi-site sampling since the management system is controlled and directed by the central office. Each region has procedures applicable to its operations, with oversight by the corporate SFI manager, assisted by SFI managers in each region. The SFI manager operates a rigorous internal audit program across all operating units. Areas are responsible for developing corrective actions and reporting to the central office. The internal audit program is one upon which Bureau Veritas Certification can place a high degree of reliance to ensure continued conformance with the SFI standard.

The company had elected to audit all sites over a four-year period, resulting in more sampling than is required by IAF-MD-01. However, due to COVID-19 restrictions, the decision was made to limit the number of sites to the minimum sampling required by IAF-MD-01 for 2020, which is four sites (sq. ft. $39 = 6.24 \times 0.6 = 3.74$).

Sites	Sites Audited During this Event
Seattle Washington (central office function)	X
Arkansas/Oklahoma	
Kiamichi, OK	
Cossatot, AR	

Saline, AR	
Atlantic region	
Coastal Georgia	X
Florida	
Low Country, SC	
Lower Columbia	
Northwest Oregon	
Yacolt, WA	
Cathlamet, WA	
St. Helens, WA	
Mississippi/Louisiana	
Hammond, LA	
Hattiesburg, MS	
Brookhaven, MS	
Mississippi/Alabama	
Pine Hill, AL	
Meridian, MS	
Columbus, MS	
North Carolina/Virginia	
Virginia	
North Carolina	
Northern Hardwoods	
Lewisburg, WV	
Northern Kingdom, NH	
Three Rivers, ME	
Moosehead, ME	
North Louisiana	
Ruston, LA	
Winnfield, LA	
Crossett, AR	
North Washington	
Pe Ell, WA	
Aberdeen, WA	
Vail, WA	
North Cascades, WA	
Piedmont	
Foothills, GA	
Chattahoochee, GA	
South Oregon	
South Valley, OR	X
Coos Bay, OR	X
Coquille, OR	X
Willamette Valley	
Springfield, OR	
Snow Peak, OR	
Mid Coast, OR	
Clackamas, OR	
Alsea, OR	

Audit Results

The document review was conducted to determine if Weyerhaeuser's system documentation continues to meet the requirements of the SFI 2015-2019 Standard Forest Management Edition. The central office audit also examined the company's procedures for meeting multi-site requirements. The field audit in the South Oregon region consisted of a review of 13 harvesting operations, 12 of which had recently been site prepared and planted. Two stream enhancement and two research projects were also reviewed. The field audit in the Coastal Georgia portion of the Atlantic region consisted of a review of nine regeneration/site preparation tracts, four harvest sites; three clear cuts and one thinning, and one mid-rotation release tract.

Objective 1-Forest Management Planning:

Weyerhaeuser's management system planning has experienced very few changes in the past year. It still operates an inventory system termed FMS. Inventory is at the stand-level throughout the organization, except a strata level inventory is in place in parts of New England. The inventory is grown using a proprietary growth and yield model combining its own data with established models from coops, with the exception of the Northern Hardwood region, which uses FVS. Lands are classed according to best land use and cover type. A GIS is in place. Soils are mapped in the GIS with soils information in the background. Soil information is derived from the NRCS. Harvest scheduling is done using a proprietary scheduling model termed "Harvey". It is done at a tactical level (three years) and at a strategic level (up to two rotations). Harvest scheduling is updated based on circumstances such as a catastrophic event or changing markets. A review of non-timber issues includes an analysis on conservation initiatives and easements. Biodiversity at landscape scales consists of the identification of restricted and non-restricted environmental constraints in the harvest planning process

The long-term harvest plan for each region continues to demonstrate the company is tracking its harvest levels very closely with planned. The growth versus harvest comparison for both regions demonstrated the company has been harvesting close to growth for the past several years, with some years being higher and some lower. One average, its harvest levels are very close to growth. This demonstrates the company's long-term plan is sustainable. Cut-out volume was within 2% of inventory in Southern Timberlands. It was within 4.4% of inventory in the South Oregon region. This is an indication the growth and yield model is fairly accurate in predicting actual volumes. This data is used to adjust future harvest levels approximately every three to five years if necessary.

None of the regions conduct many forest cover type conversions. It is very rare in Western Timberlands. Some conversions occur in Southern Timberlands regions, but is typically environmental beneficial conversions, such as converting a sweetgum plantation to loblolly pine. The company has a process to evaluate the ecological consequences of conducting species conversions. The company does not typically convert to a non-forest use, but in the rare cases in which it does, it knows to notify receiving mills the wood is not to be considered SFI certified.

Objective 2-Forest Health and Productivity:

A procedure is in place to ensure artificially regenerated stands are planted within two growing seasons after harvest. All harvest units are regenerated within two years in the Western Timberlands regions. The company did not regenerate 2,275 acres out of 19,677 acres available from the past 2 years in the Atlantic region in 2019. This is due to wet ground conditions in this flat part of the world with an overabundance of rainfall the past couple of years.

Weyerhaeuser continues to minimize herbicide use, using only the chemical mix and rates needed to provide free-to-grow trees, with rates well below label maximums. This is the case for both the South

Oregon and Atlantic regions. Herbicide prescriptions are site-specific depending on the vegetative conditions present on each site. The company is transitioning to more ground-based applications to reduce risk. This was especially the case in the Coastal Georgia area. All herbicide applications reviewed during the audit in this region were ground-based. This significantly reduces the risk of off-target applications, and potential adverse reactions from neighbors, particularly in Oregon.

The company has experienced a number of herbicide drift instances into off-target areas in the South Oregon region. One site with fairly significant drift was observed during the audit. There were apparently six other sites with drift of varying degrees. Weyerhaeuser self-reported these issues to the Oregon Department of Forestry (ODF) and the lead auditor and had already conducted investigations and implemented some corrective actions. The willingness of the company to be forthcoming and begin corrective actions helped the lead auditor decide not to issue a major non-conformance. However, the lead auditor also believed the investigation may have missed a few critical components, so decided to issue a minor non-conformance to encourage the company to make sure its root cause analysis and corrective action plans are sufficiently thorough to prevent reoccurrence of these issues in the future.

Weyerhaeuser had previously obtained a variance for the use of Rozol for mountain beaver control in Western Timberlands from its previous certification body. This lead auditor reviews this variance each year and agreed that it should remain in effect. The company does not use any pesticides banned under the Stockholm Convention.

Soil productivity was very well protected in all regions. Weyerhaeuser continues to operate an excellent process for monitoring soil disturbance. It developed a soil disturbance classification system that provides guidelines for soil risk ratings, rutting depth allowances, and the extent of the site that can be rutted based on soil management groups (SMGs). All employees interviewed during the audit were very well aware of the guidelines and were very knowledgeable about the SMGs present on their audit sites.

Objective 3-Protection and Maintenance of Water Resources:

Compliance with the Oregon FPA as it relates to riparian areas was evident on all harvest sites reviewed during the audit in the South Oregon region. Riparian management zones (RMZs) were very well established, and erosion control measures were in place. The road system was very well maintained, ensuring no sediment delivery into stream courses. Compliance with Georgia BMPs was observed on all harvest sites in the Coastal Georgia area. This area is very flat, offering little erosion risk. There are also few active stream courses. What few crossings were observed in this region were all on ephemeral drains or flats, providing no risk to water quality.

Objective 4-Conservation of Biological Diversity:

The conservation of biological diversity is highly regulated in Oregon. The state has a notification process for harvesting and herbicide applications that provide a review by ODF. The state reviews each notification for the potential presence of rare, threatened, or endangered species, and notifies the company if it missed something in its planning process. Much of the focus of the company's program to conserve biological diversity focuses on threatened and endangered (T&E) species, particularly the Northern spotted owl, Marbled murrelet, and anadromous fish species, since these garner so much attention in this region of the country. However, the company considers a number of other species of concern when planning management activities. This was evident in the Coastal Georgia area which has an abundance of gopher tortoise, a G3 ranked species of concern. Employees were very well aware of the soil types preferred by the gopher tortoise and took extra precautions to protect their burrows during harvesting, site preparation, and regeneration activities.

Standing and large woody debris retention is also regulated by the Oregon FPA. All harvest sites reviewed during the audit demonstrated compliance with the FPA. A concerted effort to retain stand-level habitat elements was also seen in Coastal Georgia. Ample “ponds” were retained, especially important when few opportunities for stand-level retention were found.

Weyerhaeuser has gathered information on the occurrences of T&E species, FECVs, and G3-G5 species and communities of concern across its land base. These appear as either points or polygons in their FMS system and show up on the compliance warning system (CWS), alerting foresters on the potential presence when planning an activity. Not all G3-G5 species and communities are considered for protection. The need for protection for G3-G5 is determined by the certification manager. The company also has a landscape assessment program that is being improved each year. All employees in Coastal Georgia were obviously well trained in the company’s landscape classification system.

Employees were well aware of invasive species that could occur in their area of operations. The company has an aggressive treatment program for invasive species, particularly scotch broom in the west, and kudzu in the south, although there are a number of other species present in both areas that are treated by the company.

Objective 5-Management of Visual Quality and Recreational Benefits:

Weyerhaeuser has an aesthetic management program in place. The company has identified aesthetically sensitive areas and incorporated them into its FMS system as a CWS layer. Average clear-cut size for the company for 2019 was 85 acres. Weyerhaeuser calculates average clear-cut size as simply clear-cut acres divided by the number of clear-cut units. All clear-cuts reviewed during the audit demonstrated compliance with the Oregon FPA green-up requirement or the company’s own green-up requirement in the south.

Objective 6-Protection of Special Sites:

Weyerhaeuser has program to identify and protect historically, culturally, and geologically unique sites on its land. This information comes from the state historic preservation office (SHIPO) in Oregon, or the state natural heritage programs in the Southern Timberlands, or from its own discoveries. These sites are identified on the GIS and appear as CWS layer when activities are planned in an area where a special site may be located.

Objective 7-Efficient Use of Fiber Resources:

Utilization was acceptable on all harvest sites observed during the audit with the exception of several drags of wood left on a thinning job observed on the Coastal Georgia area. It was too wet to come back to retrieve the wood, and since it was the only incident observed during the audit, the lead auditor did not believe it warranted a finding.

Objective 8: Recognize and Respect Indigenous People’s Rights:

Weyerhaeuser has a policy in place to respect the rights of indigenous peoples. Local indigenous peoples have the opportunity to comment on notifications issued in Oregon. There are very few tribes in the regions in the south, and none have any land in the vicinity of Weyerhaeuser property, or any interest in the company’s land.

Objective 9-Legal and Regulatory Compliance:

Weyerhaeuser maintains a list of applicable laws and regulations. A matrix is developed listing each regulatory requirement and the steps required to ensure compliance. Regulatory compliance is provided through appropriate training of employees and contractors. Contracts contain language requiring compliance with laws and regulations. Pre-activity planning and inspection processes also are conducted to ensure compliance. An internal audit procedure is also in place to monitor compliance with applicable regulatory requirements. The company has a written policy in place to comply with social laws. Weyerhaeuser has received no communication from interested parties concerning it or its supplier's performance relative to IOL core conventions.

All employees interviewed during the audit on both regions were well aware of the regulatory requirements for reporting petroleum spills in the states in which they operated.

Objective 10-Forestry Research, Science and Technology:

The company is one of the few forest products companies in the U.S. that continues to operate an internal research program. Its science and technology group either conducts its own research or cooperates with other entities, most particularly NCASI, to facilitate research efforts. But the company not only contributes to a wealth of research, it does an outstanding job of taking the results of research to the field and helping to facilitate the incorporation of these results into forest management activities. The company's efforts to incorporate research into field applications warranted the issuance of a notable practice.

The company produced evidence it has access to the potential effects of climate change on forests and forest productivity, and wildlife and wildlife habitat.

Objective 11-Training and Education:

Weyerhaeuser has a written statement of commitment to the SFI standard posted on its SharePoint, which is accessible to all employees. Each area has a training program that identifies the requirements for all personnel. Training records provided evidence that employees have been trained as required by its training program. The company requires loggers to have at least one person on each job who maintains current training status. Evidence was provided on each harvest tract reviewed during the audit that at least one person on each job had been trained according to the SIC's requirements. Weyerhaeuser's written agreement with loggers contains a requirement for the use of qualified loggers.

Objective 12-Community Involvement and Landowner Outreach:

Weyerhaeuser is a member of the SICs in all states in which it operates. The company has ensured that all landowner information brochures produced by the SICs contain all the requirements of the SFI standard, including information on the conservation of biological diversity. The company is very involved in a number of conservation planning efforts across its ownership. They are also heavily involved in outreach efforts in all the regions covered during this audit.

Objective 13: Public Land Management Responsibilities: N/A

Objective 14-Communications and Public Reporting:

A review of the SFI, Inc. website provided evidence the company submitted its 2019 surveillance audit report as required for public review. The company has procedures in place to provide for all the pieces of information needed to complete the SFI annual progress report. An e-mail transmission from SFI, Inc. provided evidence the company submitted the 2019 annual progress report in a timely

manner.

Objective 15-Management Review:

Weyerhaeuser has a management review process in place. The company has developed a very robust internal audit process to evaluate progress towards achieving conformance with its own SFI program and achieving SFI objectives. The internal audit program is one upon which BVC can rely on to ensure continued conformance. The company conducts management review at least annually.

Findings

Previous non-conformances:

No non-conformances were issued during the previous audit.

Non-conformances:

One minor non-conformance was issued during this audit due to herbicide drift into off-target areas. The SF02 nonconformity report is shown below.

Opportunities for Improvement:

No opportunities for improvement were issued.

Notable Practices:

1. PM 10.1, Ind. 1: Weyerhaeuser does an excellent job of transferring the results of research efforts into forest management decisions. Science and technology personnel are very interactive with field staff, transferring knowledge on a variety of subjects, whether its biodiversity related, such as a retained structures study, or forest productivity related, such as a reduction in herbicide use trial. This emphasis on research is unique among the forest products industry, where very few companies continue to conduct their own research efforts.

Logo/label use:

Weyerhaeuser uses the SFI certified sourcing label with approval from SFI, Inc. The SFI logo is used for promotional purposes, also with approval. No unauthorized use of the SFI logo was observed. The company does not use the Bureau Veritas Certification logo.

SFI reporting:

The 2019 surveillance audit report was posted on the SFI, Inc. website as required for public review.

Review of Previous Audit Cycle:

N/A

Conclusions

Results of the audit indicate Weyerhaeuser's SFI program across the United States continues to operate and implement an SFI program that meets the requirements of the SFI 2015-2019 forest management standard, with the exception of one minor non-conformance. The non-conformance must be cleared within 30 days of the closing meeting before a recommendation for continued certification can be made.

Follow-up

The company provided a very detailed root cause analysis and corrective action plan to address the minor non-conformance. The non-conformance was cleared and the company recommended for

continued certification to the SFI 2015-2019 Forest Management Standard.

SEE SF61s FOR AUDIT NOTES

Summary of Audit Findings:									
Audit Date(s):		From: 3/10/2020 (Seattle) 8/10/2020 (South OR) 10/5/2020 (Atlantic region) 10/7/2020 (Coastal GA)				To: 3/10/2020 (Seattle) 8/14/2020 (South OR) 10/5/2020 (Atlantic region) 10/8/2020 (Coastal GA)			
Number of SF02's Raised:			Major:		0		Minor:		1
Is a follow up visit required:			Yes	No	X	Date(s) of follow up visit:			
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan(s) Accepted			Yes	X	No	N/A	Date:		10/20/2020
Proceed to/Continue Certification			Yes	X	No	N/A	Date:		10/24/2020
All NCR's Closed			Yes	No	N/A	X	Date:		
Standard audit conducted against:									
1)	SFIS 2015-2019 FM Edition			3)					
2)				4)					
Team Leader (1):			Team Members (2,3,4...)						
Richard Boitnott; CF, TX AF									
			3)						
			4)						
			5)						
Scope of Supply: (scope statement must be verified and appear in the space below)									
Forest management									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date		TBD							
Audit Report Distribution									
Weyerhaeuser: KatieCava-katie.cava@weyerhaeuser.com									
BVC: Lorisa Love-lorisa.love@us.bureauveritas.com									
BVC: Amanda Lujan-amanda.lujan@us.bureauveritas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Amanda Brooks, Seth Carpenter, Meline McCurdy, Chris Muckenfuss, Kathy Sommers, Henning Stabins, Ben Dow, Ara Erickson, Kevin Godbout, Amanda Sandhop, Brian Mumby, Chad Leatherwood, Andy Hopkins, Mic Holmes, Shane Sutton, Stuart Stine, Mike Rochelle, Jessica Homyack, Laura Six, Eric Surcre, Dan Newton, Kelly Dougherty, Bill Frings, Blaine Powell, Jeff Grogan, Jason Shipman, Jason Richardson, Bob Wallis, Mike Rundell, Doug Mays, Rob Steiner, David Williams, Matt Brantley, James Castleberry, David Hornsby, Ken Durand, Conner Fristoe, Dave Zoufal, Scott Flick, Daniel Greene, Hayden Evans, Daniel Adkins, Jimmy Barrett, Steve Brown, Dennis Clubb, Caleb Currier, Zaina Gates, Garrick Logue, Steve Manning, Liam Patrick, Tyler Pope, Steve Smith, Luke Walker, Andrew Brown, Clay Mangum, Chad Leatherwood, Aaron Pool</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions and appreciation for selecting Bureau Veritas Certification ➤ Scope of the audit ➤ Audit schedule/plan ➤ Nonconformance types – Major / Minor ➤ Review of previous nonconformances - 0. ➤ Process approach to auditing and audit sampling ➤ Confidentiality agreement ➤ Termination of the audit ➤ Appeals process ➤ Closing meeting timing
Closing Meeting	<p>Participants: See attached list</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Review of audit process - process approach and sampling. ➤ Review of OFIs and System Strengths ➤ Nonconformances - 1 ➤ Date for next audit. ➤ Reporting protocol and timing



SF02/NA NONCONFORMITY REPORT

Company Name and Site:		SF02#:	
Weyerhaeuser		SF02-S4-01	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US.2976180	Surveillance #4	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
10/8/2020	SFIS Ind. 2.2.8		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Amanda Sandhop
REQUIREMENT OF AUDITED STANDARD:			
Indicator 2.2.8 requires the organization to use best management practices in herbicide applications, including d) designation of streamside and other buffer strips			
OBSERVED NONCONFORMITY:			
One site observed during the audit (Siuslaw 1200) had significant overspray into off-target areas. The company indicated it has six other sites with overspray of varying amounts into off-target areas. This represents a departure from the company's own herbicide application procedures.			
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	10/20/2020	Company Representative:	Amanda Sandhop
Root Cause Analysis and Corrective Action			

Root Cause: Weyerhaeuser assembled a cross-functional team to evaluate the root cause of overspray events identified by the company which were reflected in the minor non-conformance finding issued by the auditor. Based on this evaluation, Weyerhaeuser has identified the following root causes for the spray incidents:

WESTERN TIMBERLANDS

- 1) Unreliable stream mapping within the Oregon state database. These maps have been used to identify stream channels on shapefiles provided to pilots for use during herbicide applications.
- 2) The combination of unreliable stream mapping (noted above) and difficulties observing the stream channels from the air due to thick canopies resulted in off-target application.
- 3) Inconsistencies between whether and how foresters identified stream buffers on shapefiles supplied to pilots may have resulted in pilot confusion of where the stream buffers were located.
- 4) Flight paths perpendicular to riparian areas and in tight corners increased probability of off-target application.
- 5) Pilot decision to apply herbicide in an area of a unit that the shapefile excluded from application.

Corrective Action Plan: With these root causes in mind, the cross functional team developed an updated set of procedures for unit mapping prior to aerial herbicide application and application practices to protect resources without comprising pilot safety. Updated measures in the Weyerhaeuser’s spray procedures include:

- 1) Utilizing a combination of technical tools and on-the-ground review to improve accuracy of stream mapping in shape files provided to pilots.
- 2) Systematically including herbicide buffers on shapefiles provided to pilots across Western Timberlands.
- 3) Increasing herbicide application buffers along streams beyond regulatory requirements to minimize risk when conducting aerial application in mountainous terrain.
- 4) Encouraging pilots to fly parallel to all buffers, even where not required by regulatory requirements, and to coordinate with foresters before application when parallel application is not possible due to terrain or other safety concerns.
- 5) Removing acreage for aerial application where terrain or other factors present a challenge to safe, on-target consistent application.
- 6) Clarifying company expectations that pilots do not apply to areas of a unit that are excluded in the shapefile.

Since the date that these corrective actions have been incorporated into company spray procedures, we have had no incidents. These procedures were developed for the specific conditions and silviculture strategies in Western Timberlands. Learnings from this root cause analysis and development of corrective actions will be shared with the Northern Hardwood and Southern Timberland regions for evaluation of their specific spray programs.

ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT					
(To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)					
Root Cause: Acceptable					
Corrective Action Plan: Very well done					
Plan Accepted:	Yes	X	No		Comments:
Auditor:	Richard Boitnott			Date:	10/24/2020
CORRECTIVE ACTION IMPLEMENTATION					
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days 1 Year					
Corrective Action Completion Date:		Company Representative:			

Corrective Action Implementation: Method used to verify effectiveness of action taken:													
CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)													
Accepted:			Yes		No		Nonconformance Closed:			Yes		No	
Follow Up Comments:													
Auditor:							Date:						