



**BUREAU
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**Bureau Veritas Certification
North America, Inc.
SFI Fiber Sourcing Audit Report**

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Contract Number	US2976181

Contract Number:	US.2976181	Certification Audit:		Re-Certification Audit:		Surveillance: (Indicate visit # or Pre-Assessment)	4
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Audit Summary

This report summarizes the results of the fourth surveillance audit conducted on Weyerhaeuser’s SFI program for its United States fiber sourcing operations. Mr. Richard Boitnott, Bureau Veritas Certification lead auditor, conducted the audit. Mr. Boitnott served at lead auditor throughout the audit process. 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 the audit is “fiber sourcing under purchased stumpage and open market programs”. The audit was conducted against the SFI 2015-2019 Fiber Sourcing Standard. All applicable SFI indicators were covered during the audit. Objectives 11-13 were found to be nonapplicable. 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 fiber sourcing program was conducted on March 10th, 2020 in conjunction with a corporate review of the company’s forest management, chain of custody, and certified sourcing label use audits. Mr. Boitnott conducted a field audit for one day in the Montana procurement region on August 3rd. Mr. Boitnott also conducted a review of the procurement operations for three mills out of the Gulf South region for 2.5 days September 28th through the 30th, with 0.5 days of region-level document review conducted the afternoon of the 28th, followed by two days of remote review of non-fee (purchased stumpage) and outside purchase (open market) tracts on the 29th and 30th. A closing meeting was held at the close of business on the 30th. An audit plan was developed and is on file with Bureau Veritas Certification.

Company Information

Weyerhaeuser’s fiber sourcing program encompasses 18 mills over the Eastern United States and eight locations in the Western Timberlands region. This audit process covered the manufacturing facilities as shown below. The company sources much of its wood from its own ownership in the Gulf South region. Wood is procured under purchased stumpage (referred to as non-fee) and open market (referred to as OSP) programs in the Gulf South, and only under an open market program in Montana. Weyerhaeuser monitors its open market suppliers using a combination of state data and on-site monitoring of BMPs in Montana, Mississippi, Alabama, and Louisiana.

Multi-Site Requirements

The company maintains a multi-site certification consisting now of seven procurement areas covering 26 locations. The company qualifies for multi-site sampling since the management system is controlled and directed by the central office. Each area has procedures applicable to its region of operations, with oversight by the SFI manager. The SFI manager operates an internal audit program across all operating units. Areas are responsible for developing corrective actions and reporting to the central office. The internal audit is one upon which Bureau Veritas Certification can rely upon to ensure continued conformance to the standard.

In addition to the central office function, a minimum of four mills are to be reviewed during each audit event. Four were reviewed during this audit.

Sites	Sites Audited During this Event
Seattle, WA (central office function)	X
Mid-South Region <ul style="list-style-type: none"> Emerson, LA Veneer/plywood Arcadia, LA OSB Zwolle, LA Veneer/plywood Dodson, LA Lumber Idabel, OK Lumber Dierks, AR Lumber 	
Gulf South Region <ul style="list-style-type: none"> Holden, LA Lumber Bruce, MS Lumber Philadelphia, MS Lumber McComb, MS Lumber Millport, AL Lumber 	X X X
East Region <ul style="list-style-type: none"> Elkin, NC Lumber Sutton, WV OSB Buckhannon WV Lam Beams Grayling, MI OSB New Bern, NC Lumber Plymouth, NC Lumber Greenville, NC Lumber 	
Oregon Procurement <ul style="list-style-type: none"> Cottage Grove Oregon Lumber Santiam Oregon Lumber Springfield Oregon chip yard (TOPS) 	
Washington Procurement <ul style="list-style-type: none"> Raymond Washington Lumber 	

<ul style="list-style-type: none"> • Longview Washington Lumber • Longview Washington Export Yard • Olympia Export Yard 	
Montana Procurement (Kalispell, Columbia Falls, Montana)	X

Audit Results

The document review was conducted to determine if Weyerhaeuser continues to operate an SFI program that meets the requirements of the SFI 2015-2019 Fiber Sourcing Standard. The field audit consisted of a review of four open market tracts in Montana, six open market and six purchased stumpage tracts in Mississippi and Alabama. The tracts in Mississippi and Alabama were reviewed remotely using drone technology. This was due to COVID-19 restrictions. The lead auditor selected the tracts in advance and instructed the fiber sourcing employees to focus particularly on stream courses, crossings, and approaches to crossings. The company did a good job of presenting evidence remotely. The results of the audit are shown below.

Objective 1-Biodiversity in Fiber Sourcing:

The company provides information to suppliers and landowners on the conservation of biological diversity through a landowner information brochure developed by the SIC. The brochures include ample information on the conservation of biological diversity.

The company has a process to address any potential occurrences of T&E species or FECVs on purchased stumpage tracts. The company uses NatureServe to determine the potential presence of T&E and G1/GS species. County-level species profiles are gathered and analyzed for habitat possibilities. This information is provided to cruisers and logging contractors, instructing them to be aware of the potential presence of the habitat associated with T&E and G1/G2 species. In reality, most of the timber purchased is from pine plantations, unlikely places for these species to occur.

Objective 2-Adherence to Best Management Practices:

Weyerhaeuser has written agreements with all suppliers from whom it purchases wood. The written agreements contain a requirement for the use of BMPs. Wet weather guidelines are in place and have been communicated to suppliers. They consist primarily of increasing storage capacity at its mills and building wood inventory prior to historic wet weather seasons, and the identification of acceptable operating conditions on purchased stumpage tracts. Weyerhaeuser uses the same soil disturbance guidelines used by the company's forest management operations. The lead auditor considered this to be a notable practice. Fiber sourcing policies are documented and communicated to suppliers either through an annual letter or submission of their annual contract. The company has a procedure to ensure compliance with state BMPs. The only region reviewed during the audit with a purchased stumpage program was Gulf South. All purchased stumpage tracts reviewed in the Gulf South region during the audit demonstrated compliance with the BMP requirements of Mississippi and Alabama.

Both Montana and Gulf South use a combination of state BMP monitoring data with their own on-site review of BMP compliance of its open market suppliers. Any issues found on open market tracts are communicated directly to the supplier. Monitoring results are summarized and communicated to suppliers through an annual letter, identifying areas for improvement. Results are also discussed with state BMP foresters to incorporate into logger training programs. A review of open market tracts in Montana identified no issues. The remote review of open market tracts in the Gulf South identified some BMP issues on two tracts, including the installation of un-needed stream crossings on one tract

and inadequate use of erosion control measures on roads and skid trails on another. All of these issues were noted on the BMP audit form, and the contractors notified of these deficiencies. In one case the contractor made immediate corrections to skid trails and roads. In another case the contractor was selected for future audits and showed considerable improvement. This showed the company's system for setting goals to maintain or improve rates of BMP compliance is quite effective.

Objective 3-Use of Qualified Resource and Qualified Logging Professionals:

Weyerhaeuser requires loggers to be qualified according to the requirements of the SICs in the states in which it operates. The list of trained loggers is available on state logger training websites.

Objective 4-Legal and Regulatory Compliance: Weyerhaeuser has access to applicable laws and regulations. Weyerhaeuser conducted a very robust due diligence system to determine the risk of procuring wood from illegal sources to be low. There have been no adverse regulatory actions taken against the company in any of the states covered during this audit.

Objective 5-Forestry Research, Science and Technology: Weyerhaeuser is a member of NCASI, which provides funding for a wide variety of research topics. The company is also directly involved in many research efforts. Fiber sourcing employees provided evidence they have access to the potential impacts of climate change on forests and forest productivity, and on wildlife and wildlife habitat.

Objective 6-Training and Education: A statement of commitment to the SFIS 2015-2019 standard has been communicated to all employees. Records verified training of employees has occurred as required by the company's procedure. Weyerhaeuser requires all loggers to be trained according to the SIC in the states in which it operates. The company's master service agreement contains a requirement for the use of qualified loggers. Evidence was provided that all loggers harvesting both purchased stumpage and open market tracts were trained in accordance with SIC requirements. All logger training programs in the states covered by this audit have a continuing education requirement.

Objective 7-Community Involvement and Landowner Outreach: Weyerhaeuser provided evidence of financial support of all the SICs in the 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. Weyerhaeuser presented ample evidence of its involvement in educational efforts. The company's participation in the SICs includes support for an inconsistent practices program. Weyerhaeuser has a procedure for handling inquiries and complaints from the public. One complaint was received in Louisiana but was investigated and found to have no merit.

Objective 8-Public Land Management Responsibilities: N/A

Objective 9-Communications and Public Reporting: A review of the SFI, Inc. website provided evidence the fiber sourcing organization of Weyerhaeuser submitted its previous 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 10-Management Review: Weyerhaeuser has a management review process in place, and management review is held at least annually. The most recent management review in the Gulf South included a discussion of the results of BMP monitoring and goals set to maintain or improve rates of

BMP compliance. This addressed a concern raised last year by the lead auditor who found no such discussion in the management review meeting minutes in North Carolina.

Objective 11-Promote Conservation of Biological Diversity, Biodiversity Hotspots and High-Conservation Wilderness Areas: N/A

Objective 12-Avoidance of Controversial Sources including Illegal Logging: N/A

Objective 13-Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws: N/A

Findings

Previous non-conformances:

No non-conformances were issued during this audit

Non-conformances:

No non-conformances were issued during this audit

Opportunities for Improvement:

No opportunities for improvement were issued.

Notable Practices:

One notable Practice was issued:

1. PM 2.1, Ind. 3: The Gulf South region's use of the same soil disturbance guidelines used by Weyerhaeuser's forest management operations is a commendable way of addressing adverse impacts to soil productivity during wet weather. This is applied to purchased stumpage tracts but is also evaluated on open market inspections.

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 found on the SFI, Inc. website as required for public review.

Review of Previous Audit Cycle

N/A

Conclusions

Results of the audit indicate Weyerhaeuser continues to implement a program that meets the requirements of the SFI 2015-2019 Fiber Sourcing Standard. Since no non-conformances were issued the company is recommended for continued certification to the SFI 2015-2019 Fiber Sourcing Standard

SEE SF61s FOR AUDIT NOTES

Summary of Audit Findings:									
Audit Date(s):		From: 3/10/2020 (Seattle) 8/3/2020(MT) 9/28/2020 (Gulf South)				To: 3/10/2020 (Seattle) 8/3/2020 (MT) 9/30/2020 (Gulf South)			
Number of SF02's Raised:			Major:		0		Minor:		0
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	No	N/A	X	Date:			
Proceed to/Continue Certification		Yes	X	No	N/A	Date:		9/30/2020	
All NCR's Closed		Yes	No	N/A	X	Date:			
Standard audit conducted against:									
1)	SFI 2015-2019 FS Standard			3)					
2)				4)					
Team Leader (1):			Team Members (2,3,4...)						
Richard Boitnott; CF, TX AF,			2)						
			3)						
			4)						
			5)						
Scope of Supply: (scope statement must be verified and appear in the space below)									
Fiber Sourcing under purchased stumpage and open market programs									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	TBD								
Audit Report Distribution									
Weyerhaeuser: KatieCava-katie.cava@weyerhaeuser.com									
Weyerhaeuser: Chad Leatherwood-chad.leatherwood@weyerhaeuser.com									
BVC: Amanda Lujan-amanda.lujan@us.bureauveritas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Rick Cozine, Kent Moore, Jesse Hunter, Jonathan Brown, Stan Copeland, Jason Farrell, Chesley Heatherly, Ben Herrin, Jeff Jackson, Chelsea Lopez, Ben McDonald, Jake Moody, Tyson Stribling, Doug Summerford, Lonnie Wascom, Chad Leatherwood</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions ➤ 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:</p> <ul style="list-style-type: none"> ➤ Chad Leatherwood, Kent Moore, Jeff Jackson, Jared Richardson, Stan Webb, Jesse Hunter, Gail Johnson, Rudean Reynolds, Tyson Stribling, Jake Moody, Butch Copeland, Stan Copeland, Ben McDonald, Jimmy Campbell, Lonnie Wascom, Kathy Sommers, Kayla McKenzie, Rick Cozine <p>Discussions:</p> <ul style="list-style-type: none"> ➤ >Introductions and appreciation for selecting Bureau Veritas Certification. ➤ Review of audit process - process approach and sampling. ➤ Review of OFIs and System Strengths ➤ Nonconformances - 0 ➤ Date for next audit. ➤ Reporting protocol and timing