

Does GreenFirst Forest Products Inc. meet FSC's Controlled Wood standard?

April 15, 2026

We are carrying out an audit of GreenFirst Forest Products Inc. located in Toronto, Ontario, Canada to see if their operations comply with FSC's [Controlled Wood](#) standard (FSC-STD-40-005 V3-1). We are writing to you to ask if you know of any reason why their operations would not meet this standard.

Controlled Wood is wood that meets minimum requirements and that can therefore be mixed with FSC wood and used in products with an FSC Mix label. In particular, the wood must not be:

- harvested illegally.
- harvested in violation of traditional and civil rights.
- harvested from forests with a high conservation value that is threatened by management activities.
- harvested from forests being converted to plantations or non-forest use.
- from forests in which genetically modified trees are planted.

We will carry out our audit in the week of May 26th, 2026. Here is how you should comment, if you wish to do so:

- When? You should send comments to us before or during the audit.
- How? You can comment by:
 - Meeting with a Preferred by Nature staff member in person.
 - Phone to James Hallworth. His phone number is 249-516-1655
 - Writing to James Hallworth at:
P.O. Box 1771
Chelsea, QC J9B 1A1
Canada .
 - Email to James Hallworth at jhallworth@preferredbynature.org
 - In person by arranging to meet with James Hallworth
- If you want your comments to be confidential please notify us when you submit the comments.

If you provide comments, we will provide feedback to you within 30 days of the audit.

GreenFirst Forest Products Inc. has written a summary document that lists:

- the risks they have identified that they may source unacceptable wood
- the measures they implement to mitigate those risks.

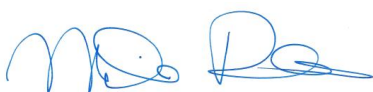
We have attached this summary document to this letter.

If you wish to dispute any aspect of this forest certification process or the decision we reach as to whether this company meets the Controlled Wood standard, you can access our Dispute Resolution Policy at <https://www.preferredbynature.org/node/9284>.

Thank you for any help you are able to provide.

If you have any recommendations for contacting other stakeholders that may have an interest in providing comments on this company and audit, we would also gladly receive these from you.

Yours sincerely,



Mélanie Proulx

FSC™ Controlled Wood Public Summary of Due Diligence System for GreenFirst Forest Products (Ontario) Inc.

March 2026

A. General Information

Certificate Holder Information	
Certificate Holder Name (current)	GreenFirst Forest Products (QC) Inc
FSC Certificate Code (current)	PBN-COC-061510; PBN-CW-061510 expiry 25/07/2026
DDS Contact Person	Chris McDonell, Chief Forester
Summary of changes made to the organization's DDS (changes to supplier structure, risk assessment, risk designation, mitigation, control measures, etc)	The DDS was updated in March 2026 and is in conformance with the FSC Canada National Risk Assessment (NRA) 2019.

B. Feedback/Complaints

The contact person for inquiries or complaints:	
Name	Chris McDonell, R.P.F.
Position	Chief Forester-Ontario
Address	222 McIntyre Ave East Suite 200 North Bay, ON P1B 2Y9
Phone	(705) 840-8391
Email	Chris.mcdonell@greenfirst.ca

Complaints Procedure

This section provides a framework for handling comments and complaints from stakeholders that are related to GFFP Due Diligence System (DDS). Any individual or organization may file a complaint against our DDS.

Reception of request and complaint

Any GFFP's operational sites covered under the scope of FSC chain of custody multi-site certificate who receive a verbal or written external request or complaint related to our due diligence system or risk designation of our fibre supply chain including our suppliers and sub-suppliers of wood and/or wood products forwards it promptly to Central Office certification coordinator.

The certification coordinator will record the information in the FSC Controlled Wood – Stakeholder input and complaint form and coordinate a response according to the following steps:

Complaint resolution mechanism

- a. Receipt of complaint will be acknowledged within 48 hours. Requests for information and precision can be made at that time to the complainant.
- b. An initial response will be provided to complainant within a period of two (2) weeks (10 business days).
- c. If complaint relates to a risk designation in relevant FSC risk assessments, the complaint will be forwarded to the responsible body (for a National Risk Assessment (NRA), FSC).
- d. A preliminary assessment will be conducted 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. If the complaint is found to be groundless, GFFP will inform the complainant in writing explaining why we arrived at such conclusions, while offering the complainant the possibility of providing new information.
- e. A substantial complaint will be forwarded to Preferred by Nature 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 to resolve the complaint, as well as how a precautionary approach will be used shall be included with the complaint.
- f. A precautionary approach will be employed towards the continued sourcing of the relevant material while the complaint is active.
- g. A verification process (e.g. a field verification) will be implemented for a complaint assessed as substantial within two (2) months of the receipt.
- h. Corrective action to be taken by a supplier if the complaint has been assessed and verified as substantial will be determined as well as the means to implement the corrective action. If a corrective action cannot be determined and/or enforced, the relevant material and/or supplier will be excluded from our fibre procurement.

- i. Corrective actions taken by suppliers as well as their effectiveness will be verified. If no corrective actions are taken the relevant material and supplier will be excluded.
- j. GFFP will inform the complainant, Preferred by Nature and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution.
- k. GFFP will record, file and maintain all complaints received, actions taken and copies of relevant correspondence for a period of five years.

C. Supply Chain

Site Names	Non-certified Material type sourced	Exact number of suppliers	Approximate number of sub-suppliers	Supplier Types	Average length of non-FSC supply chain	Risk of Mixing with non-eligible input
GreenFirst Sawmills Northeastern Ontario (Hearst, Kapuskasing, Cochrane, Chapleau)	Logs	12	0	Harvest contractors, Company crews	1	No Risk of Mixing Movement of Crown wood is authorized by MNRF (AOL) with Bills of Lading indicating origin, approval number and load specifications. MNR conducts audits periodically. Records of wood received are kept available for inspection.
Northeastern Ontario - Kap Paper Inc.	Chips	4	Integrated with GFFP sawmills	Sawmills	2	No Risk of Mixing Chips move directly from sawmill to newsprint mill.

Risk Assessment

Country	Supply Area	Risk Designation	Type of Risk Assessment	Name of Risk Assessment	Reference to Applicable control measure number
Canada	Northeastern Ontario	Cat.1: Negligible risk	FSC	FSC Canada NRA V2.1	N/A
		Cat.2: Non-negligible risk			Non-negligible Risk for 2.3 (see Section E1)
		Cat.3: Non-negligible risk			Non-negligible Risk for 3.1 (see Section E3) Non-negligible Risk for 3.2 (see Section E2)
		Cat.4: Negligible risk			N/A
		Cat.5: Negligible risk			N/A

D. Control Measures

No.	Type	Description of the control measure
E1	FSC Recommended	1. Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose the Forest Management Plan.

E2	FSC Mandatory	<p>Non-negligible Risk for 3.2 – Control Measure 2 for IFLs</p> <p>Forest Operations do not reduce an IFL below 50,000 ha, AND meet applicable option below:</p> <ul style="list-style-type: none"> a) For an IFL between 50,000 and 62,500 ha, cumulative forest operations do not affect more than 10% of the IFL. b) For an IFL between 62,501 and 75,000 ha, cumulative forest operations do not affect more than 20% of the IFL. c) For an IFL between 75,000 and 200,000 ha, cumulative forest operations do not affect more than 30% of the IFL. d) For an IFL between 200,001 and 500,000 ha, cumulative forest operations do not affect more than 35% of the IFL. e) For an IFL larger than 500,001 ha cumulative forest operations do not affect more than 45% of the IFL.
E3	FSC Mandatory	<p>Non-negligible Risk for 3.1 – Woodland Caribou</p> <p>For small Private Managed Forests (SLIMF)</p> <p>4. Evidence exists that that owners and/or managers are informed about”</p> <ul style="list-style-type: none"> - the critical habitats of species within their managed forests AND - the threats to the critical habitat, AND - best management practices to reduce threats to critical habitat, AND - applicable legislation

E. Stakeholder Consultation by the Organization

Not applicable as a company risk assessment has not been used.	
Area for which Stakeholder consultation was conducted:	N/A Stakeholder consultation not required.

F. Engagement of Experts by the Organization

Area for which Experts were engaged:	
	While technical experts were not engaged, information was sourced from the following organizations: Ministry of Natural, Ministry of Environment, Conservation and Parks, Ontario Nature and Environment and Climate Change Canada, websites of First Nation communities and other Indigenous sources.

G. Field Verification by the Organization

Area where field verification is identified.	N/A Field verification not required.
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