

Carbon Footprint of the Irving Forest Supply Chain

PAS2060 Declaration of Carbon Neutrality 2021 Qualifying Explanatory Statement

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EXECUTIVE SUMMARY

Since 1882, J.D. Irving, Limited and its affiliates (Irving) have been committed to quality products and service. With headquarters in Saint John, New Brunswick and 19,000 employees across the diverse family-owned operations in both Canada and the United States, Irving contributes to eight business sectors, including:





CARBON FOOTPRINT OF THE IRVING FOREST SUPPLY CHAIN

The core of the Irving strategy is vertical integration, linking the segments of Forestry and Forest Products, and Consumer Products (Forest Supply Chain). Irving's commitment to improving the sustainability of its Forest Supply Chain is rooted in values from long-term forest ownership. We believe that if we look after the forest, the forest will continue to look after us. A key aspect of sustainability is understanding the Carbon Footprint of the Forest Supply Chain.

This document describes the organizational Carbon Footprint of the Irving Forest Supply Chain¹ (Supply Chain). The Boundary of the Supply Chain is not defined by legal or corporate structure, but rather accounts for the Carbon Footprint associated with all forest related operations, including Forest Management, Forest Products processing, manufacturing, related transportation, and administrative activities that support the production of lumber, wood pellets, growing media, Kraft pulp, paper, Tissue, diaper and corrugating medium products and related by-products under the equity control of Irving to the point of sale to third parties (Customers). This document excludes any declaration as to the Carbon status of any specific product manufactured by the Supply Chain and is expressly limited to the Boundary of the Supply Chain, in its entirety, as described herein.

¹ Includes operations wholly or partially in various Irving entities, including J.D. Irving, Limited, Irving Pulp & Paper, Limited, Irving Paper Limited, Irving Consumer Products Limited, Irving Consumer Products, Inc., New Brunswick Railway Company, Grand River Pellets Limited, Rothesay Paper Holdings Ltd., St. George Pulp & Paper Limited, St. George Power LP, Charlotte Pulp and Paper Co. Ltd., Miramichi Timber Holdings Limited, Allagash Timberlands LP, Aroostook Timberlands LLC, Maine Woodlands Realty Company, Maritime Innovation Limited, Irving Forest Products, Inc., Irving Air Services Inc., and Forest Patrol Ltd. The Supply Chain excludes operations that do not use any wood fiber derived from forests or primary production facilities managed by Irving.

DECLARATION OF CARBON NEUTRALITY

An accounting of the Carbon Footprint of the Boundary has determined that the Supply Chain is Carbon Neutral. This document forms the Qualifying Explanatory Statement (QES) which describes in detail the assumptions and methodology for accounting of the Carbon Footprint in accordance with PAS2060:2014, the GHG Protocol Corporate Accounting and Reporting Standard, the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard, and the GHG Protocol Scope 2 Guidance.

The Declaration of Carbon Neutrality (Declaration) encompasses activities in three major categories in the Supply Chain:

- Direct and Indirect Emissions.
 - Scope 1 Direct GHG emissions
 - Scope 2 Indirect GHG emissions associated with purchased energy
 - Scope 3 Indirect GHG emissions from activities in the Supply Chain,
- Net Forest Growth from Freehold forests.
- Net transfer of carbon dioxide to Harvested Wood Products.

In addition to the accounting of GHG emissions and removals, the QES describes the following:

- In 2023, Irving will repeat this process under • A detailed description of the activities that PAS2060:2014 and disclose its 2022 Carbon make up the Supply Chain, Footprint in the Supply Chain in an updated QES.
- Disclosure of Biogenic carbon emissions,
- Exclusions of non-material GHG emissions and rationale.

- Analysis and discussion of inherent uncertainty associated with estimating and accounting for GHG emissions.
- Planned short-term reductions in the Carbon Footprint.

Accounting and disclosure of the Carbon Footprint for the Supply Chain is a first step. Accounting for emissions in the Irving Forest Supply Chain was prioritized due to high interest from stakeholders. Accounting for the Carbon Footprint of other J.D. Irving, Limited affiliated companies that are not related to the Forest Supply Chain may be disclosed in future years by way of separate Qualifying Explanatory Statements that are specific to such business or group of businesses. The timing of future accounting and disclosure for other Irving businesses may depend on a number of factors, including requirements of accepted GHG accounting standards or regulations and the level of priority determined by interest from stakeholders. In this regard, two additional business units have been added to the Supply Chain for 2021.

The Supply Chain is committed to maintaining Carbon Neutrality within the Boundary from the year 2021 until the end of 2023.



1. **CARBON NEUTRALITY DECLARATION**

commitment to maintain to December 31, 2023."

The Qualifying Explanatory Statement (QES) contains all the required information on the Carbon Neutrality of the Supply Chain.

KPMG Performance Registrar Inc. (KPMG PRI) has conducted a limited assurance engagement in relation to our assertion of Carbon Neutrality in this QES. The KPMG PRI assurance report can be found on Page 40.

Any material changes to information reported which affects the validity of this Declaration will be updated to reflect the status of the Carbon Footprint and Carbon Neutrality of the Supply Chain.

The QES for the Supply Chain is publicly available at www.jdirvingsustainability.com

Andrew Willett Director, Sustainability & Indigenous Relations - Woodlands Division August 29, 2022

Jason Limongelli Vice President - Woodlands Division August 29, 2022

This is the second Declaration of achievement for the Supply Chain. The letter of limited assurance is attached in Appendix A.

"Carbon Neutrality of the Supply Chain has been achieved in accordance with PAS2060:2014 from January 1, 2021 to December 31, 2021, with a



2. INTRODUCTION

This document forms the second Qualifying Explanatory Statement (QES) to demonstrate that the Supply Chain has achieved Carbon Neutrality. This statement is valid for the period starting January 1, 2021 and ending December 31, 2021 in accordance with the PAS2060:2014 standard, the GHG Protocol Corporate Accounting and Reporting Standard, the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard, and the GHG Protocol Scope 2 Guidance.

Carbon Neutrality has been achieved through a comprehensive accounting of Scope 1, 2, and 3 emissions and a long-term focus on;

 Reducing CO₂e emissions in manufacturing operations under Irving equity control (sawmills, Kraft pulp, paper, and consumer products manufacturing facilities)

- Investment in manufacturing facilities which increase CO₂ transferred to Harvested Wood Products (HWP).
- Sustainable forest management resulting in improved forest growth and increased CO₂ removals by the forest on Irving owned Freehold lands in the provinces of New Brunswick (NB), Nova Scotia (NS), and state of Maine (ME);

This report includes information which substantiates the Declaration of the Supply Chain achievement of Carbon Neutrality and a commitment to continuous improvement regarding the reduction of GHG emissions in compliance with the PAS 2060:2014 standard.

3. GENERAL INFORMATION

| Entity making PAS2060 Declaration | Irving F |
|---|--|
| Individual(s) responsible for the evaluation and provision of data necessary for the substantiation of the declaration (including that of preparing, substantiating, communicating, and maintaining the declaration) | Andrew Woodla |
| Subject of PAS2060 | Emissio |
| Function of subject | The fur of quali manage |
| Activities required for subject to fulfill its function | All fores Product adminis wood p and cor the equ (Custon |
| Rationale for selection of the subject | The Sup emissio (Custon under t This pro and opp carbon |
| Basis of consolidation | The info per the |
| Type of conformity assessment has been undertaken | I3P-3 V of assur |
| Baseline date for PAS 2060 program | 2020 is |
| Achievement period | January |
| Commitment Period | Deceml |
| | |

¹ PAS 2060 refers to independent third party 'certification" and "certification bodies" in reference to performance assessment by an independent third party. Annex C Table C.3 of PAS 2060 describes the standards and codes identified as appropriate for assessing performance against the PAS and specifically identifies ISO 14064-3 as appropriate. The terms "verification" and "verification body" are the appropriate terms for assessing performance using ISO 14064-3 and are therefore used in this document.

Forest Supply Chain

w Willett – Director, Sustainability & Indigenous Relations, lands Division

ons associated with the Irving Forest Supply Chain.

nction of the Supply Chain is to provide a growing supply lity Forest Products to Customers, sourced from sustainably red forests.

est related operations, including Forest Management, Forest cts processing, manufacturing, related transportation, and istrative activities that support the production of lumber, pellets, growing media, Kraft pulp, paper, Tissue, diaper prrugating medium products and related by-products under uity control of Irving to the point of sale to third parties mers).

upply Chain approach was selected as it reflects all ons from seedling to point of sale to a third-party omer) for Irving forest products produced by organizations the equity control of Irving.

rovides for the identification of more sources of emissions oportunities to reduce emissions to take steps to maintain a neutrality.

formation is presented following the equity control method e GHG Protocol.

With independent third-party verification¹ to a limited level urance

s the baseline year

ry 1, 2021 – December 31, 2021

ber 31, 2023



3.1 OBJECTIVES

The Supply Chain objective is to maintain Carbon Neutrality by understanding the balance of GHG emissions and removals. Understanding our Carbon Footprint will provide information to Irving for continuous improvement and is essential to reducing our impact on the changing climate.

Irving started its first sawmill operation in Bouctouche, New Brunswick, Canada in 1882. The values and work ethic developed as a small familyowned business have developed since then to form the commitment we make to all our stakeholders today.

Our approach to sustainability has been simple - if we look after the forest, the forest will look after us. This approach balances the short-term needs of the business with the long-term vision required to nurture generations of forests. Healthy, growing forests are good for today and future generations. We consider it a privilege to be stewards of the forest and strive to be good neighbors to our communities, partners with our stakeholders, and responsible suppliers to our Customers.

Important sustainability topics across the Supply Chain include:

- Reinvesting in Freehold forest lands and manufacturing operations to ensure long-term economic benefits to our employees and local communities where we work and live.
- Long-term management of the forest to increase the wood supply of high-quality Forest

- Products for our Customers by ensuring thatG we always grow more wood than we harvest.ur Key to this strategy is a commitment to plantingtrees for more than 60 years.
- Managing the forest for multiple values, including clean water, wildlife habitat,
 n biodiversity, and recreation.
- Reducing waste in the forest to ensure we maximize the use of every tree harvested and reducing waste from manufacturing operations.
 - Reducing water consumption in manufacturing operations and exceeding water quality regulations.
- Reducing air emissions, including reducing
 GHG emissions and increasing CO2 removals
 on all forest lands.
- Developing strategies for adapting to a changing climate in the forest and manufacturing facilities.

In 2021, we published a comprehensive Forest Products Sustainability Report for the year 2020 to highlight our approach to sustainability. In 2022, we published a focused Environment, Social, and Governance (ESG) report for the Forest Supply Chain operations in 2021. To learn more, please visit www.jdirvingsustainability.com for a copy of our most recent reports.

3.2

REDUCING GREENHOUSE GAS EMISSIONS AND CARBON NEUTRALITY

Climate change is an existential threat to society and the Forest Supply Chain is well positioned to make a positive impact. Globally, a reduction in society's carbon footprint is required. Reducing GHG emissions and increasing removals from the forest are two ways we can do our part to contribute to Carbon Neutrality.

Carbon Neutrality is important for four reasons:

3.2.1. DOING OUR PART FOR THE PLANET

Understanding and reducing our Carbon Footprint began with Pulp & Paper operations in the 1990s, and Irving has had internal measurement and reporting in place for Scope 1 and 2 emissions since 2008 across the Supply Chain. Emissions have reduced by more than 8 per cent, with a focus on fuel switching to Biogenic fuels and producing electricity with waste steam. In recent years, absolute emissions have increased with growth in the tissue business.



¹ Emissions prior to 2020 were not independently reviewed.

As the output of the Supply Chain continues to grow, GHG emission intensity is also measured. GHG emissions intensity has continued to decline over time, with intensity reduced by 38% since 2008.



In 2013, we participated in a study with University of New Brunswick's Dr. Chris Hennigar (Cameron 2013), to model the carbon balance from forestry activities, manufacturing facilities and forest products to end of life. The study showed that our forestry business would absorb more carbon than emitted over the next 50 years.

Carbon Neutrality expectations have evolved since 2013. To improve transparency, reporting of our Carbon Footprint will follow international standards with independent third-party assurance. Our first PAS2060:2014 declaration was made public in 2022 for emissions in 2020.

PAS2060 DECLARATION OF CARBON NEUTRAILTY - 2021 QUALIFYING EXPLANATORY STATEMENT



3.2.2. MANAGING CLIMATE CHANGE RELATED RISKS

higher precipitation could impact operations that supply wood to mills. Kraft pulp, paper, and Tissue operations that require significant water resources in manufacturing could be impacted by changes to precipitation and physical assets, by rising seas and more severe storms. Other issues and impacts of climate change may not yet be known, so we must limit future warming by addressing these risks on a global scale.

Managing climate change related risks to the business allows us to continue to provide for our employees, communities, and Customers. Reducing GHG is important to decrease the business risks associated with a changing climate. In forty years, the trees that we have planted today will be growing and harvested in a very different climate. Changes to temperatures and precipitation will impact tree growth, species composition, pest, and fire risk. Shorter, warmer winters or

3.2.3. **REDUCING INFLATIONARY RISKS RELATED TO GHG EMISSIONS**

Quantifying our Carbon Footprint allows Scope 3 emissions will also rise. These increased management to understand the business risk from costs will eventually be passed through the Supply the inflationary costs associated with regulatory Chain. prices on CO₂e emissions. Carbon taxes are in By understanding inflationary risks, Irving can effect in Canada with prices planned to increase target opportunities for decarbonization across each year until 2030 and are anticipated in the the Supply Chain. Decarbonization is good for the United States. While carbon taxes and regulations planet and good for business. have a direct impact on the cost of Scope 1 and Scope 2 emissions, indirect costs associated with

INNOVATION AND PARTICIPATION IN THE 3.2.4. **CIRCULAR BIO-ECONOMY**

Understanding the Supply Chain Carbon Footprint the circular bio-economy, producing renewable helps identify opportunities for innovation in forest Forest Products that can replace plastic, concrete, related operations. This innovation creates new and steel, and produce more green energy. opportunities for Irving to participate in building

PAS2060 DECLARATION OF CARBON NEUTRAILTY - 2021 QUALIFYING EXPLANATORY STATEMENT



4. **ORGANIZATIONAL BOUNDARIES**

Over 139 years in the forest related operations means Irving has a reputation for being a responsible steward of forests and continually investing in healthy forests, modern technology, and infrastructure. Key to our success is delivering high-quality Forest Products to Customers today and into the future, and our security of that supply comes from vertical integration – from seed to shelf.





JDI FOREST PRODUCTS ARE SHIPPED TO 30 COUNTRIES AROUND THE WORLD

The organizational Boundary for the Carbon Footprint of the Supply Chain is defined as:

"All forest related operations, including Forest Management, Forest Products processing, manufacturing, related transportation, and administrative activities that support the production of lumber, wood pellets, growing media, Kraft pulp, paper, Tissue, diaper and corrugating medium products and related by-products under the equity control of Irving to the point of sale to third parties (Customers)."



FIGURE 4. IRVING FOREST SUPPLY CHAIN



The 2020 QES outlined in detail the activities of the various business divisions in the Supply Chain. For a more detailed overview, refer to the 2020 QES. A brief overview is provided below, with additional details related to the expansion of the boundary that has been added in 2021.



4.1. WOODLANDS DIVISION (WOODLANDS)

Woodlands manages all aspects of supplying roundwood logs, pulpwood, and chips to internal and external customers. Woodlands is also responsible for all aspects of forest land management on 1.3 million hectares (3.5 million acres) of Freehold land and 1.0 million hectares (2.5 million acres) of New Brunswick provincial lands (Crown License 6 & 7).

4.2. SAWMILLS DIVISION (SAWMILLS)

Sawmills operates ten manufacturing facilities in NB, NS and ME, producing spruce/fir dimensional lumber, white pine products, hardwood products, wood pellets.

In 2021 the operations that produce growing media such as peat moss, gardening soils and mulches will also be included in the Boundary. These products are produced by Juniper Organics Limited (JOL), located in Juniper, NB. JOL owns and operates a peat bog



and converting plant. In addition to producing peat, the plant also uses residual forest products such as bark, sawdust, shavings to produce horticultural growing media.

4.3. **PULP & PAPER DIVISION**

(PULP & PAPER)

Pulp & Paper operates four manufacturing facilities in NB.

- Irving Pulp & Paper Limited, a Kraft pulp mill located
- Irving Paper Limited, a thermo-mechanical paper mill
- Lake Utopia Paper, a facility producing corrugating medium
- Irving Tissue¹, Saint John, a facility producing parent rolls of tissue

4.4. **IRVING CONSUMER PRODUCTS DIVISION** (CONSUMER PRODUCTS)

Consumer Products has two major product lines. Irving Tissue Macon is a greenfield tissue operation Irving Tissue produces consumer tissue products which started in late 2019. Since the first OFS for including bath, facial, napkin and paper towel at 2020 GHG emissions. Macon has added a second four facilities and Irving Personal Care produces tissue machine and converting line, doubling the baby diapers and pants in Dieppe, NB. facility's capacity. Growth in the tissue business will have the effect of growing GHG emissions • Irving Tissue Dieppe NB, a tissue converting within the Supply Chain.

- mill
- Irving Tissue Toronto ON, producing parent rolls of tissue and tissue converting
- Irving Tissue Fort Edward NY, producing parent rolls of tissue and tissue converting
- Irving Tissue Macon GA, producing parent rolls of tissue and tissue converting
- Irving Personal Care, a diaper manufacturing facility located in Dieppe, NB



In 2021 Irving Personal Care (IPC), a diaper manufacturing facility in Dieppe, NB will be added to the Boundary of the Supply Chain. IPC produces baby diaper and pant products to be sold in Canada and the United States. Diapers are made from various plastic-based inputs and fluff pulp. The Supply Chain does not produce fluff pulp, therefore there is no Irving pulp in the IPC process.



4.5. **RATIONALE FOR BOUNDARY EXPANSION IN 2021**

The 2020 QES outlined that additional Irving not considered a Forest Product as there are not controlled operations would be added to GHG any Irving Forest Products in the finished goods. reporting and disclosure. To avoid confusion JOL is controlled by Sawmills and IPC is controlled regarding Boundary definitions all operations by Consumer Products, therefore including these within a legal entity or operating division are now operations in the Boundary is intended to improve reported by including JOL and IPC in 2021. In transparency in Boundary definition. The addition of IPC in 2021 results in a material change to the addition, retail stakeholders are interested in more disclosure related to GHG emissions. GHG footprint of the Supply Chain. Therefore, the 2020 base year emissions will be restated as Prior to 2021, JOL was not considered to produce outlined by the policy in Section 6.8.

Forest Products as peat moss harvesting was considered as an agricultural process. IPC was

5.

OPERATIONAL BOUNDARY -GREENHOUSE GAS SOURCES AND SINKS

5.1.

SCOPE 1: DIRECT EMISSIONS

Scope 1 emissions result from the combustion of fossil fuels, and CH4 and N2O emissions from the burning of Biogenic fuels. Emissions are reported from the following sources:

- 5.1.1. Mobile equipment in all operating divisions.
- 5.1.2. Company owned vehicles.
- 5.1.3. Light and heavy oil used in boilers.
- 5.1.4. Propane and natural gas in boilers, kilns, and mobile equipment.
- 5.1.5. CH4 and N2O emissions from biomass boilers.
- 5.1.6. Aviation fuels in forest monitoring and protection.
- 5.1.7. Corporate air travel.

Removals of CO2 include Net Forest Growth on Freehold forest lands, including the CO2 subsequently transferred and stored in Harvested Wood Products (HWP).

- 5.1.8. Net Forest Growth removals from changes in above and below ground biomass on Freehold forest lands. In 2021, this also includes emissions from the JOL peat bog operations.
- 5.1.9. Changes the transfer and storage of CO2 into HWP.

5.2. **SCOPE 2: INDIRECT EMISSIONS** (ELECTRICITY)

Scope 2 emissions result from purchased electricity. Emissions factors vary by jurisdiction (provincial/state) depending on the intensity of grid emissions where facilities are located. Electricity transmission emissions are included in Scope 2. Scope 2 emissions are location-based and they do not differ if calculated using a market-based approach (WRI 2015)

5.2.1. Manufacturing facilities, offices, buildings, and garages.

5.3.

SCOPE 3: UPSTREAM AND DOWNSTREAM SUPPLY CHAIN EMISSIONS

Scope 3 emissions are reported following the guidance of the Corporate Value Chain (Scope 3) Accounting and Reporting Standard (WRI 2011) except for the exclusions outlined in Section 6.4 as these lie outside the Boundary of the Supply Chain.

Scope 3 emissions result from upstream and downstream sources that are not financially controlled. The Scope 3 emissions are calculated using either primary production, spend, or other invoice generated data in combination with various published emissions intensity factors. A summary of the methodology for each emission and the associated factors is included in Appendix B. The Scope 3 emissions evaluated in the Supply Chain are:

- contractors from Private Lands (Category 1).
- Crown License 6 & 7, Other Crown Lands, and Private Lands (Category 1).
- (Category 4).
- Truck freight of Sawmill Residuals to Customers (Category 4). 5.3.6.
- 5.3.8.
- old, corrugated containers (OCC) for LUP (Category 4 and 9).
- manufacturing (Category 1).
- 5.3.11. Freight of finished Consumer Products goods to Customers (Category 9).
- 5.3.12. Commercial air travel and vehicle rentals (Category 6).
- 5.3.13. Emissions from employee commuting (Category 7).
- 5.3.13. Chemical purchases for Kraft pulp, paper, or Tissue manufacturing (Category 1).
- 5.3.15. Waste disposal from manufacturing operations (Category 5).
- 5.3.16. Capital goods purchases in the year property, plant, and equipment (Category 2).
- 5.3.18. Upstream emissions from purchased fuels (Category 3).
- 5.3.19. Purchased plastics used in diaper manufacturing (Category 1)
- 5.3.20. Consumer Packaging and Marketing including carboard and plastic wraps (Category 1)
- 5.3.21. Upstream and downstream leased assets, warehousing (Category 8).

5.3.1. Harvesting of roundwood logs or chips for all Customers (internal and external) by independent contractors from Freehold, Crown License 6 & 7, Other Crown lands or harvesting on Private Lands. (Category 1).

5.3.2. Purchased roundwood logs (harvested and delivered) from third parties for all Customers by independent

5.3.3. Light vehicle commuting by independent contractors in log harvesting and procurement from the Freehold,

5.3.4. Heavy truck transportation of logs and chips from the Freehold, Crown License 6 & 7, Other Crown Lands, and Private Lands to all Customers (internal and external) including mill yards or between holding yards

5.3.5. Rail freight of logs and chips (including Sawmill Residual chips) from transfer yards to mill yards (Category 4).

5.3.7. Truck freight of peat and soil products. Truck freight of wood pellets to FOB Port of Belldune (Category 9).

Truck and rail freight of lumber to Customers, including intra-mill transfers (Category 4 and 9).

5.3.9. Truck, rail and ocean freight of Kraft pulp, paper, and corrugating medium to Customers, including purchased

5.3.10. Procurement of parent rolls of tissue and eucalyptus pulp for Tissue production, and fluff pulp for diaper

5.3.17. Maintenance and repair parts purchases in the year – consumables and services (Category 1).

FIGURE 5. OPERATIONAL BOUNDARY OF THE IRVING FOREST PRODUCTS SUPPLY CHAIN

5.4. **CHANGES WITHIN OPERATIONAL BOUNDARY REPORTING IN 2021**

The expansion of the Boundary for 2021 to include JOL and IPC created new categories or expansion of existing categories. This includes;

- 5.3.7 is expanded to include freight of growing media products,
- 5.3.10 is expanded to include purchased fluff pulp for diaper manufacturing
- 5.3.19 is added to account for the plastic-based inputs into diaper manufacturing.
- 5.3.20 is added as a Scope 3 emissions category to capture and estimate consumer packaging and marketing emissions.

In previous years, Woodlands did not directly report Scope 1 and 2 emissions. In 2020, many of these emissions were reported under Sawmills. In 2021, Woodlands is directly reporting Scope 1 and 2 Emissions.

A NOTE ABOUT TRANSPORTATION

Irving has a transportation division and various transportation companies that operate by road, rail, and ocean ship that transport both forest products and other products. For the purposes of this analysis, transportation associated with the Supply Chain has been treated as a Scope 3 (indirect) emission rather than including the transportation division as a source of Scope 1 emissions and including emissions associated with other (nonforest) products.



LEGEND

- Scope 1: Direct Emissions Scope 2: Indirect Energy Emissions (Electricity)
- **Scope 3: Indirect Supply Chain Emissions**



5.5. HARVESTED WOOD PRODUCTS

The manufacturing operations of the Supply Chain the proportion of solid wood use by decade in focus on tree species found in local forests. The the United States using data published by the primary Forest Products are solid wood products United States Department of Agriculture (USDA 2020). This aligns with a key Irving sustainability such as construction-grade lumber from spruce and fir and decorative lumber from white pine strategy to increase removal of CO₂ by investing and hardwoods. Residuals such as bark, sawdust, in Supply Chain manufacturing to increase capacity shavings, and wood chips from these solid and technology to increase recovery of lumber wood products are transformed into energy or from logs. The half-life of lumber used in housing paper products like Kraft pulp, tissue, paper, and construction is longer than the average half-life for corrugating medium. Some lower quality trees solid wood. Therefore, increasing the proportion of are directly chipped and sent to pulp and paper lumber production that is used in housing results in mills. Some forest Residues may be collected and longer-term removal of CO_2 from the atmosphere. used for energy at pulp and paper mills. Many of Lumber sold in the Canadian market is assumed to the Residual energy products (sawdust and bark) have the same end use profile as the United States. are used internally as an energy source in the More than 90 per cent of solid wood products production of lumber or pulp, and some are sold (lumber) are sold in the US. to third party facilities that produce energy. Some For paper products, the half-life reflects paper sold

sawmill Residues are used to make wood pellets. in the United States and Canada using appropriate Most forest products store carbon over their lifespan national factors. The half-life of CO₂ in HWP used rather than emitting CO_2 back into the atmosphere in the simple decay approach are presented in in the year of production. This storage and the Appendix C. subsequent emissions as the forest products reach their end of life is estimated using the simple decay approach outlined in IPCC 2006.

The half-lives for solid wood products (lumber) reflect the end use of HWP produced by Irving. This is done by allocating Irving production by

6. **QUANTIFICATION OF CARBON** FOOTPRINT

All Scope 1, 2 and 3 GHG emissions and removals within the Boundary of the Supply Chain described above are listed below in Table 6.1. A detailed presentation of all emissions is reported in

Appendix D. Unless otherwise noted, emissions or removals are reported in metric tonnes of Carbon Dioxide Equivalents (CO_2e). As presented in Table 6.1 below, the Supply Chain is Carbon Neutral.

TABLE 6.1. QUANTIFICATION OF CARBON FOOTPRINT

| ТҮРЕ | DETAIL - EMISSION/REMOVAL | 2020 TONNES CO ₂ e | 2021 TONNES CO ₂ e | CHANGE |
|---------------|---|----------------------------------|----------------------------------|--------|
| Scope 1 | Direct Emissions (Fuels) | 391,000 | 453,000 | +16% |
| Scope 2 | Indirect Emissions (Electricity) | 510,000 | 586,000 | +15% |
| Scope 3 | Upstream and Downstream Supply Chain | 909,000 | 998,000 | +10% |
| Sub-Total: Su | pply Chain Emissions | 1,809,000 ª | 2,037,000 | +13% |
| Transfer | Net transfers (to) / from HWP | (588,000) | (546,000) | -7% |
| Removal | Net Forest Growth and Land Use – Freehold | (2,335,000) | (2,477,000) | +12% |
| Sub-Total: H | WP Transfer plus Net Forest Growth | (2,923,000) | (3,023,000) | +8% |
| Total: Net Fo | rest Supply Chain Emissions/(Removal) | (1,113,000) | (986,000) | -11% |

^aSub-total adjusted for rounding.



6.1. **OTHER EMISSIONS/(REMOVALS)**

In addition to Freehold lands, Irving manages control method is selected, Crown License 6 & 7 Crown License 6 & 7. Modeling of net removals removals could be included when accounting for resulting from forest management on Crown our Declaration. For transparency, the details are License 6 & 7 identified an additional 1,566,092 presented in Table D.2 of Appendix D. metric tonnes of CO_2 in 2020. Crown License 6 Biogenic CO₂ emissions within the Supply Chain & 7 forest removals are not accounted for in the were 1,551,000 metric tonnes of CO_2 in 2020. Declaration as we determined to use the financial A detailed breakdown of these emissions is control method for 2020 based on our current presented in Table D.3 in Appendix D. understanding of reporting expectations for such removals. In future years, if the operational

6.2.

TREATMENT OF BIOGENIC CARBON DIOXIDE EMISSIONS

Irving produces energy from biomass and biogas (Biogenic) that is derived from Residual forest products. CO₂ emissions from Biogenic sources are treated differently than CO₂ emissions from fossil fuels. Following the guidance of the Greenhouse Gas Protocol, Biogenic carbon is not reported in any of the scopes but, shall be separately reported (WRI 2011).

Modeling of net removals associated with forest management results in the carbon in all merchantable timber being treated as emitted at the time of harvest except for those amounts added to HWP to reflect storage in wood products. In practice, a significant portion of this carbon is transported from the forest to manufacturing plants where it is subsequently used to generate heat used in the manufacturing process. The associated "biogenic" emissions (i.e., those carbon dioxide emissions resulting from the use of Residual material in boilers to generate heat) are not included within the reported Scope 1 emissions from our facilities to avoid double-counting these emissions as both forest emissions and facility emissions. Irving will continue to monitor and adapt to best practices and standards for how and where to disclose biogenic emissions. For transparency and consistent with the GHG Protocol, biogenic emissions are currently embedded in our forest level accounting rather than as part of facility emissions. These biogenic emissions are also reported separately for transparency.

Forest level accounting for biogenic sources of emissions from forest residues continues to lead to a net removal of 2.3 million tonnes CO_2 from Freehold land in 2020, accounting for 35 per cent of the wood and biomass supply for the Supply Chain.

Similarly, forest level accounting for forest residues purchased from land not owned by Irving does not lead to that land being a net source of emissions. Crown License 6 & 7 (20 per cent of the wood and biomass supply in 2020), other Crown lands and Private Lands in New Brunswick (29 per cent of the wood supply) and private lands in Nova Scotia (6 percent of wood supply) are reported in this manner to Environment and Climate Change Canada annually for preparation of Canada's National Inventory Report by the Province of New Brunswick and Nova Scotia. Each of these sources is not a net emitter of CO₂ (Ward 2021 re: New Brunswick and Steenberg, 2022: re Nova Scotia). The remaining 10% of the wood supply comes from other private lands in Maine. The most recently available published information for Maine from 2018 shows that Maine forests are a net remover of carbon dioxide (Domke et. al. 2020).

Methane and nitrous oxide emitted because of heat generation from biomass in the manufacturing process are included within the Supply Chain emissions.

6.3. **METHODOLOGY**

Emissions are reported in accordance with using the half-life factors for different end-uses and the GHG Protocol (WRI 2011). Scope 1 and 2 weighted by the proportion of products by endreporting methodology follows guidance from use as reported in the United States Department the Greenhouse Gas Reporting Protocol (GHGRP) of Agriculture (USDA 2020). set by Environment and Climate Change Canada Net Forest Growth removals have been quantified (ECCC 2021) and the United States Environmental using the Carbon Budget Model for the Canadian Protection Agency (EPA 2021) guidance. Following Forest Sector, version 3 (CBM-CFS3). GHGRP guidelines ensures that Scope 1 and 2 emissions reporting aligns with government GHG A detailed description of the procedures and reporting and allows for comparison to past years. methodology for calculating each emission is Reporting follows the GHG Protocol Scope 2 included in Appendices B and C. Guidance, location-based reporting is used for To improve conservatism in the Declaration, an Scope 2 emissions, which in the Supply Chain's uncertainty analysis was applied to each major case, results in the same reported values as market emission category (Manufacturing and Supply based reporting.

Chain, HWP, Net Forest Growth) to assign a 95 Scope 3 emissions reporting follows the guidance per cent confidence interval to the calculated in the Corporate Value Chain (Scope 3) Accounting emissions. A Monte Carlo simulation was and Reporting Standard, except for the exclusions developed to model the Carbon Neutral result outlined in Section 6.6. over a range of one million possible outcomes, given the variation in the emissions or removals Net HWP removals have been quantified using a due to inherent uncertainty.

simple decay approach and guidelines from IPCC 2006. For pulp and paper products, the emissions were weighted by the proportion of products sold in Canada and the United States. For solid wood products (lumber), the emissions were weighted

6.4. **DATA SOURCES**

Primary and secondary data sources have been used to estimate emissions. Wherever possible, primary data sources are linked to financial reporting and audited financial statements. Tables 6.2 and 6.3 outline criteria for the assessment of activity or emission factor data quality.

Primary data sources include:

- a. Invoiced fuel purchases including the volume of diesel, gasoline, natural gas, propane, and heating fuels.
- b. Invoiced electricity usage by manufacturing facilities, offices, buildings, and garages.
- c. Mass of Forest Products including Residues sold, volume of lumber sold, mass of pellets, Kraft pulp, paper, corrugating medium and Tissue products sold reported in internal management systems.
- d. For Scope 3 emissions, the mass of wood harvested, delivered, or purchased from internal management systems, the number of employees comes from payroll systems, consumable and capital goods spending from financial statements, kilograms of chemicals purchased from invoice data.
- e. For freight-based emissions, distances come from third party invoiced distances or from calculating distances from publicly available mapping systems, tonnes and loads delivered are sourced from internal management systems.

TABLE 6.2. PRIMARY ACTIVITY DATA QUALITY ASSESSMENT

| ACTIVITY DATA QUALITY | ASSESSMENT CRITERIA | | EMISSIONS FACTOR QUALITY | |
|--------------------------|---|--|-----------------------------|-----------------------------------|
| Very Good | From audited financial statements, or enterprise management systems. Invoice based. Measured. Very complete. Third party audited or regulatory compliance related. | | Very Good | Factor specific Factors derive |
| Good | d From enterprise management systems. Invoice based. Mostly complete. May involve secondary conversions or estimates. Not subject to third party or regulatory audit. | | Good | National facto general proces |
| 0000 | | | Fair | Global factor o |
| Fair | Estimated or incomplete data sources, sampled. Not tied to financial reporting. No audit trail available. | | Fair | expressed in d to a process. |
| Poor | Incomplete or missing information. | | Poor | Global factor e documentation |
| | | | | |



Secondary data sources include:

- cycle analysis best practices. All factors and standards are referenced in Appendix E.
- the piece work rates paid to contractors.

TABLE 6.3. SECONDARY EMISSIONS FACTOR DATA QUALITY ASSESSMENT

a. Emissions factors sourced from published government sources, published papers, or following life-

b. For wood harvesting and delivery, factors are estimated at the machine level by Irving and are tied to

CRITERIA

pecific to a region, process, and less than 5 years old. lerived from actual data.

factor, factor between 5-10 years. Factor for a process.

actor or national factor with significant uncertainty d in documentation, or national factor not specific

actor estimated older than 10 years. Back up ntation incomplete.



6.5. **ASSUMPTIONS AND ESTIMATIONS**

All CO₂e emissions and removals are estimates taken from both direct and indirect sources using the best available factors to convert activity data to emissions. To improve the quality of estimates, activity data is based on financial and enterprise reporting systems and has been reviewed. The assumptions and procedures are described in the methodology in Appendix B.

CO₂e emissions and removals from Net Forest Growth are also generated from enterprise systems that facilitate long term Forest Management. These

systems include geographic information systems (GIS), enhanced forest inventory, growth, and yield models (G&Y), and forest management planning software. The same systems that calculate forest inventory, growing stock, and calculate annual allowable harvest levels, are used to estimate the net forest carbon emissions. A detailed description of the process to determine the change in CO₂e emissions from Net Forest Growth are described in Appendix C and in the 2020 QES available online.

6.6. **EXCLUSIONS**

straw, bagasse, and South American pulp. Wood Verification of emissions using PAS2060:2014 requires 95 per cent of emissions to be included fibre sourced in the Irving Supply Chain has a and allows for the exclusion of minor emissions lower impact compared to "tree-free" fibre sources, less than 1 per cent. For completeness and to and a similar impact compared to post-consumer produce a conservative estimate of emissions, the (recycled) fibre. A summary of this analysis can be Supply Chain has included all emissions sources found in the 2020 Forest Products Sustainability Report (JDIL 2020). investigated, including those emissions that are less than 1 per cent. A listing of each emission In addition to the fibre supplied by local,

source is presented in Appendix B. sustainably managed forests, the Supply Chain The following Scope 3 emissions outlined in sources eucalyptus pulp from South American WRI 2011 are excluded. The Supply Chain does producers for a portion of its fibre supply. not include any franchises (Category 14), or These sources are Forest Stewardship Council investments (Category 15). Therefore, no emissions (FSC) certified, indicating that no natural forest from Category 14 or 15 are reported. conversion to plantation has occurred since 1994 (FSC 2015). Following the International Panel on The Boundary of this Declaration of Carbon Climate Change guidance (IPCC 2003), emissions from land conversion reach an equilibrium after 20 years, therefore emissions from land conversion in the purchased pulp Supply Chain do not occur within the Boundary.

Neutrality ends at the point of sale to third parties. Therefore, the processing of sold products (Category 10), the use of sold products (Category 11) and end-of-life treatment of sold products (Category 12) are excluded. The Boundary was defined to provide a complete record of the Any future changes to reporting standards or emissions within the equity control of Irving. Due control method (e.g. operational control) that to the integrated nature of the Supply Chain, require reporting beyond the Boundary as currently emissions from the processing of sold products are defined may impact the Declaration of Carbon substantially reported as Scope 1 and 2 emissions. Neutrality in future years.

The Supply Chain relies on virgin fibre procured from sustainably managed, local forests. In 2020, Irving conducted a life cycle analysis comparison of different feedstocks to produce Tissue, including post-consumer (recycled) fibre, bamboo, wheat



6.7. UNCERTAINTY

Reporting CO₂e emissions is based on estimates, assumptions, and factors from multiple sources. Therefore, uncertainty is inherent in any reported CO₂e emissions. Uncertainty has been evaluated following the guidance of the Greenhouse Gas Protocol and the published Quantitative Inventory Uncertainty document and online Uncertainty Calculation Tool (GGP 2011). An assessment of the quality of the primary activity data and secondary emissions factor data used in the uncertainty analysis is included in Appendix B and C.

This approach uses a pedigree matrix to assess the quality of both the source activity data and the emission factors used to calculate uncertainty of associated CO_2e emissions. A pedigree matrix was developed for each of the major CO_2e emission categories – Direct and Indirect Emissions; HWP; Net Forest Growth. In this way, cumulative

uncertainty across the three major CO_2e emission categories may be calculated and compared.

Using the pedigree matrix approach and the online Uncertainty Calculation Tool, total uncertainty for each category is expressed with a 95 per cent confidence interval of the geometric standard deviation. The tool expresses the absolute value of the emission, so removals (negative emissions) are expressed as a positive value.

To understand how the sum of emission and removal categories, with associated uncertainty, impact the probability of a Carbon Neutral result, a Monte Carlo simulation model was developed, and one million simulations of random scenarios were produced. This allows for the probability of a Carbon Neutral result to be determined over the range of uncertainty calculated in each emission or removal category.

6.7.1. DIRECT AND INDIRECT EMISSIONS

There is inherent uncertainty in the calculated Direct and Indirect emissions. To reduce inherent uncertainty, the following steps were taken with the data.

- Use of activity data from financial statements (spending, production) or internal management systems
 Woodlands forest inventory to determine the tree species distribution.
- Use of published government or academic emissions factors
- Use of current emissions factors

A summary of the total uncertainty analysis is presented below in Figure 6. Error bars represent the 95 per cent confidence interval of the total uncertainty that ranges from 1,833,059 tonnes of emissions to 2,263,521 tonnes of emissions.





6.7.2. HARVESTED WOOD PRODUCTS (HWP) TRANSFER

- There is inherent uncertainty in the calculatedtransfers to and from HWP. To reduce inherentuncertainty, the following steps were taken withthe data.
- Regionally based and published tree density factors by species.
 - Published product end use half-life factors, rather than average factors.
- Published end use of solid wood products in the United States.

A summary of the uncertainty analysis is presented below in Figure 7. Error bars represent 95 per cent confidence interval of the total uncertainty that ranges from -400,061 tonnes of transfer to -746,134 tonnes of transfer.



6.7.3. NET FOREST GROWTH

There is inherent uncertainty in the calculated Net Forest Growth calculations. Emissions and removals were calculated using the CBM-CFS3 model. This model is the current standard in reporting emissions from Net Forest Growth and it is based on the best available science. There is inherent uncertainty in model inputs and forecasts of forest inventory, forest growth and depletion. The modeled parameters are based on permanent sample plot (PSP) data. For these reasons, the user guide for the CBM-CFS3 model states *"At this time, it is impossible to state the level of uncertainty of results obtained with the CBM-CFS3..."*.

Sources of inherent uncertainty in the net forest growth removal are listed below:

- Uncertainty in the opening forest inventory
- Growth and yield curves used to forecast changes in forest growth
- Depletions of forest inventory (harvesting or natural disturbance)
- Equations used to convert above ground merchantable volume to carbon
- Equations used to convert dead organic matter.
- Disturbance matrices to simulate impacts from management or natural disturbance.
- Algorithms within the CBM-CFS3 model to initialize carbon pools (plot based).

To reduce uncertainty in the inventory and forest growth, Woodlands uses modern technology to determine forest inventory and modern techniques following current scientific guidance. A detailed description of this process is provided in Appendix B, which includes a bibliography of the publications and best practice guidelines used to determine the current inventory, forest depletions and forecasted inventory.

A summary of the uncertainty analysis is presented below in Figure 8. Error bars represent the 95 per cent confidence interval of the total uncertainty that ranges from -1,948,624 tonnes of removal to -3,156,339 tonnes of removal.

FIGURE 8. UNCERTAINTY ANALYSIS FOR NET FOREST GROWTH REMOVALS WITH 95 PER CENT CONFIDENCE INTERVALS.



6.7.4. MONTE CARLO SIMULATION OF RESULTS WITH UNCERTAINTY RANGES

A Monte Carlo simulation was developed to determine the net CO_2e emissions from the three categories given the range of uncertainty calculated with the pedigree matrix approach. The probability that the three categories are carbon neutral (X<O) is determined using the following simple equation: A Monte Carlo simulation was developed to the proportion of simulations where the categories yielded a net positive emission (X>O). The net emission of the three categories yielded a positive result (not carbon neutral) in 261 of one million simulations. Alternatively, the Supply Chain may be considered carbon neutral in 99.97 per cent of simulated scenarios.

Total Net Emission (X) = Direct and Indirect Emissions – Transfer to HWP - Net Forest Growth

A histogram of the results of one million simulations is presented below in Figure 9.

FIGURE 9. HISTOGRAM OF MONTE CARLO SIMULATION RESULTS







6.8.

POLICY REGARDING BASELINE YEAR AND CHANGES TO REPORTED EMISSIONS OR BOUNDARY CHANGES

The year 2020 was the first year of accounting for the complete GHG footprint of the Supply Chain which included Scope 3 emissions, Net Forest Growth, and the transfer to HWP. Therefore, 2020 is chosen as the baseline year for emissions reporting for the Supply Chain.

Future changes to reporting year-over-year are expected for many reasons as GHG accounting and reporting in the Supply Chain matures. Updates to previous years' reporting could be required due to changes or improvements to methodologies, activity data or emission factors. Changes or improvements that result in changes in total gross Scope 1, 2 and 3 emissions greater than 5%, or HWP transfer and Net Forest Growth emissions/ (removals) greater than 10% will result in restating previous years' emissions.

Changes to the organizational Boundary could also result in changes total gross Scope 1, 2 and 3 emissions greater than 5%, or HWP transfer and Net Forest Growth emissions/(removals) greater than 10% will result in restating previous years' emissions.

For material changes in emissions related to the above, restatement will follow the "Base year recalculation methodologies for structural changes" outlined in Appendix E to the GHG Protocol Corporate Accounting and Reporting Standard (WRI 2005). For boundary expansion or improvements to reporting for business units in the Supply Chain, restatements will follow the "all year" approach by weighting the current year emissions and restating by the previous year's production compared to the current year. For any acquisitions or divestitures, the "pro-rata" approach will be used.

7. **CARBON FOOTPRINT MANAGEMENT PLAN**

7.1. **COMMITMENT TO CARBON NEUTRALITY**

The Supply Chain is committed to Carbon Neutrality Irving has internally forecasted planned business following the PAS2060:2014 standard and is growth, planned emissions reductions and planned committed to continuing to reduce GHG emissions future harvest levels to assess the impact on a in the harvesting, processing, and transportation of Declaration of Carbon Neutrality. Forecasted Forest Products. business growth does not negatively impact a commitment to Carbon Neutrality within the In addition. Woodlands is committed to continue current PAS2060:2014 standard and defined Forest Management practices that increase Boundarv.

CO₂ removals using nature-based solutions by increasing the growing stock on Freehold and Guidance on carbon emissions and removal Crown License 6 & 7 forest lands. This effort will accounting are currently being revised. The following may impact a future commitment increase the wood supply and CO₂ removed by the to a Declaration of Carbon Neutrality under forest over the long term. Climate change poses risks to long-term forest planning (e.g., through PAS2060:2014. changes in frequency or distribution of natural • Future changes to accounting standards for disturbances, changes in growth and yield). To emissions or removals mitigate this risk. Woodlands uses an adaptive management approach by revising the long-term Carbon Neutrality reporting standards including (80 year) forest management plan every 5 years. changes to PAS2060:2014 There is current research underway to forecast • Changes to the organizational Boundary future climate scenarios on forest growth and composition in the local region. Woodlands will continue to monitor this research and incorporate new learning in the management planning process.

7.2. **EMISSIONS REDUCTIONS ACTIVITIES**

Reduction in GHG emissions is overseen by the Environment, Social and Governance (ESG) committee of senior executives in each of the Supply Chain operations. Emissions sources and operational plans to reduce emissions are identified annually. Scope 1 and 2 emissions have reduced by 22 per cent since 2008 across the Supply Chain to reduce the cost of fossil fuels. Continued reductions are urgent to limit global warming and reduce the cost of fossil fuels as carbon taxes in Canada will continue to increase the costs.

The strategy to continue to reduce carbon emissions is divided into four themes:

- 1. Fuel switching Increased use of Biogenic fuels to replace fossil fuels, use of waste steam to offset fossil fuel use and reduction of solid waste that can be diverted to better use.
- 2. Energy efficiency reduction or recycling of heat, more energy efficient systems, reduced

equipment idling or waste, increased use of rail or more efficient transportation systems, electricity generation, and productivity improvement.

- 3. Increased forest growth (increased removals from growing more than is harvested) increased Freehold tree planting levels, reduced harvest levels, improved utilization of pulpwood products, and increased yields with precision silviculture tools and techniques to match species and sites.
- 4. Increase solid wood product production improving recovery of lumber from logs and investments to improve sawmill capacity will transfer more CO2 to HWP than occurs with shorter-lived products like paper.

Emissions are monitored and reported annually to customers and stakeholders in the Forest Products Sustainability Report (ESG reporting).

| DIVISION | TYPE | PROJECT DESCRIPTION | YEAR | GHG IMPACT (Tonnes) |
|----------------------|----------------------|---|------|---------------------------|
| Woodlands | Energy Efficiency | Installation of an electric flail chipper at LUP reducing diesel powered in-woods flail chipping installed in 2022 (annualized impact). | 2022 | 1,800 |
| Woodlands | Energy Efficiency | Increasing tri-drive log trucks to increase payload and reduce the number of trips to move logs to mills. | 2022 | 760 |
| Woodlands | Energy Efficiency | Switch 100,000 tonnes of chips by rail from truck from Central NB. | 2022 | 3,500 |
| Sawmills | Energy Efficiency | Commissioning of a new back-pressure turbine at a sawmill using waste steam to generate electricity. | 2023 | 2,400 |
| Sawmills | Fuel Switching | Investment in the boiler at a sawmill to use less heating fuel and more biomass in the winter. | 2023 | 3,000 |
| Consumer Products | Energy Efficiency | Reduced waste to landfill from Macon, GA by redirecting for beneficial use. | 2022 | 3,500 |

7.4.

CARBON OFFSET PROGRAM

The purchase of third-party carbon offsets is not anticipated to be needed, given the emissions reductions planned and negative emissions associated net forest growth on an annual basis. Surplus carbon removal may be subject to the marketing of forest carbon offset credits to external parties, subject to offset protocol and market conditions.

7.3. **GHG REDUCTION PROJECTS**

To continuously reduce GHG emissions the following is a sample of projects across Irving. Operations within the Supply Chain assess potential projects for decarbonization or productivity improvement (fuel efficiency) as part of the annual budgeting process. Initiatives are included in the budgeting process as they may require capital and impact operating costs. The ESG Steering Committee collects the various projects and initiatives annually. Upcoming projects are listed in Table 7.1.

PAS2060 DECLARATION OF CARBON NEUTRAILTY - 2021 QUALIFYING EXPLANATORY STATEMENT

TABLE 7.1. EMISSIONS REDUCTION INITIATIVES



8. **VERIFICATION PROCEDURE**

The declaration of carbon neutrality has been independently third party verified as being in accordance with PAS2060:2014 by KPMG Performance Registrar Inc. (KPMG PRI) of Vancouver, British Columbia. The assurance engagement was conducted in accordance with ISO 14064-3: 2019 to a limited level of assurance.

The scope of KPMG PRI's assurance and the activities undertaken as part of the assurance process are described in KPMG PRI's report in Appendix A.

PAS2060 DECLARATION OF CARBON NEUTRAILTY - 2021 QUALIFYING EXPLANATORY STATEMENT

APPENDIX A: LIMITED ASSURANCE REPORT FROM KPMG PERFORMANCE REGISTRAR INC.

| _ | |
|---|---|
| | ISO 14064-3: 2019 Verification Report JD Irving, Limited August 29, 2022 Page 8 |
| | E. Verification Statement |
| | To J.D. Irving, Limited, |
| | We have been engaged by J.D. Irving, Limited to examine the Net GHG Emissions/(Removals) assertion (the Assertion) of J.D. Irving, Limited and its affiliates for the Irving Forest Supply Chain for the year ended December 31, 2021 as described in the <i>Carbon Footprint of the Irving Forest Supply Chain PAS2060 Declaration of Carbon Neutrality 2021 Qualifying Explanatory Statement</i> (the Report). |
| | J.D. Irving, Limited is responsible for the preparation and presentation of the information within the Report. Our responsibility is to express a conclusion as to whether anything has come to our attention to suggest that the Assertion is not presented fairly in accordance with verification criteria, which comprise: |
| | PAS 2060:2014 Specification for the demonstration of carbon neutrality; and, The World Resources Institute / World Business Council for Sustainable Development Greenhouse Gas Protocols A Corporate Accounting and Reporting Standard (Revised), GHG Protocol Scope 2 Guidance – An Amendment to the GHG Protocol Corporate Standard and Corporate Value Chain (Scope 3) Accounting and Reporting Standard. |
| | Our duties in relation to this report are owed solely to the report addressees. Accordingly, we do not accept any responsibility for any loss occasioned to any third party acting or refraining from action as a result of this report. |
| | We completed our examination in accordance with ISO 14064-3: 2019 <i>Specification with Guidance for the validation and verification of greenhouse gas assertions</i> . As such, we planned and performed our work in order to provide a limited level of assurance with respect to the Assertion. The verification activities applied in a limited level of assurance verification are less extensive in nature, timing and extent than in a reasonable level of assurance verification. As a result, the level of assurance obtained is substantially lower than would have been obtained had a reasonable level of assurance verification been performed. We believe the evidence we obtained is sufficient and appropriate to provide a basis for our conclusion. |
| | Based on our examination, nothing has come to our attention that causes us to believe that the Assertion presented in the Report is not, in all material respects, presented fairly in accordance with the verification criteria. |
| | Greenhouse gas and energy use data are subject to inherent limitations. A number of different measurement techniques may be utilized in accordance with the requirements of the verification criteria which may vary in precision and /or outcome, resulting in different greenhouse gas emissions estimates, which may be material. |
| | KPMG PRI Vancouver, BC |
| | |

APPENDIX B: METHODOLOGY AND PROCEDURES FOR DATA COLLECTION AND QUANTIFICATION (all listed emissions are included in the declaration)

| CATEGORY | EMISSION/ REMOVAL | ACTIVITY DATA QUALITY | EMISSION FACTOR QUALITY | REPORTING OR CALCULATION METHODOLOGY | REFERENC |
|----------------|---|-----------------------------|-------------------------------|---|-----------------|
| 5.3.1 5.3.3 | Limit harvesting emissions | Very Good | Good | Annual production of roundwood in metric tonnes delivered to all Customer destinations multiplied by the litres per metric tonne factor for the mix of harvesting systems. Hardwood roundwood stratified as converted by a flail chipper or chip plant. Fuel consumption information from detailed machine cost analysis and productivity information from Irving's management system which is tied to contractor per-tonne payment calculated based on 2020 data. | Internal Facto |
| 5.3.1 | Limit flail chipping emissions | Very Good | Good | Annual production of flail chips in metric tonnes delivered to Customers multiplied by the litres per metric tonne factor for the mix of flail chipping systems. Fuel consumption information from detailed machine cost analysis and productivity information from Irving's management system which is tied to contractor per-tonne payment calculated based on 2020 data. | Internal Factor |
| 5.3.2 5.3.3 | Purchased roundwood emissions | Very Good | Good | Annual purchased volume of roundwood in metric tonnes from all sources (Freehold, Crown License 6 & 7, Other Crown lands, Private lands) multiplied by the litres per metric tonne factor calculated based on 2020 data for the estimated mix of harvesting systems. Purchased wood systems are assumed to be consistent with the average Irving harvesting systems. Purchased hog fuel for pulp and paper and purchased Residuals for Grand River Pellets have been excluded as the volumes are de minimis. | Internal Factor |
| 5.3.4 | Limit roundwood and chip delivery emissions (trucking) | Very Good | Good | Annual proforma fuel consumption calculated based on 2020 data in litres of roundwood and flail chip trucking from the trucking rate management system. This system calculates the litres consumed (and paid to contractors) on each two-way trip by calculating the distance by road class and the fuel burn by road class (speed) by truck type for each trip for each tonne. Litres per metric tonne factor developed. Includes transportation from yards. | Internal Factor |
| 5.3.4 | Purchased roundwood delivery emissions (trucking) | Very Good | Good | Annual purchased roundwood production in metric tonnes from all sources (Freehold, Crown License 6 & 7, Other Crown lands, Private lands) multiplied by the litres per metric tonne factor calculated based on 2020 data from the Irving roundwood trucking. This factor will be created by dividing the Irving roundwood proforma litres by the delivered Irving roundwood metric tonnes. | Internal Factor |

Vancouver, BC August 29, 2022

| CATEGORY | EMISSION/ REMOVAL | ACTIVITY DATA QUALITY | EMISSION FACTOR QUALITY | REPORTING OR CALCULATION METHODOLOGY | REFERENCES | CATEGORY | EMISSION/ REMOVAL | ACTIVITY DATA QUALITY | EMISSION FACTOR QUALITY | REPORTING OR CALCULATION METHODOLOGY | REFERENCES | | | | | |
|----------------------------------|---|-----------------------------|--|---|--|--|---|--|---|--|-----------------------|--|-----------------------|--|---|--|
| 5.1.1 5.1.3 5.1.4 5.1.7 | Woodlands offices, garages, nurseries and forest protection activities. | Very Good | Good | Emissions calculated following the NIR from fuels reported from the financial systems and invoices. Heating fuel, waste oil, propane, gasoline used in Woodlands offices, fire caches and garages. Diesel consumption for graders, tractors, excavators, plows, dump trucks, and gasoline for all Woodlands cars, pickups and light trucks. Log loaders will be excluded and included in Sawmill | ECCC 2021 EPA 2021 | 5.3.8 | Sawmill Lumber Freight to customers (internal and external) | Very Good | Fair | Emissions from rail and truck freight from Sawmills to final destination (store or distribution centre). Data source is miles of freight by rail or truck from the Mercury Gate freight management system. Shipments of lumber in Mfbm by truck and rail converted to metric tonnes from lumber sales. Tonne-km factor for Kg/CO2e referenced. | EPA 2021 | | | | | |
| | | | | fuel consumption. Invoiced fossil fuels used in nurseries, tree improvement and seed orchard operations. Invoiced aviation fuels used by Forest Patrol Ltd. for fire protection, monitoring, VIP transport, and herbicide application from invoices. Woodlands is reporting their own emissions for 2021 (no longer included in Sawmills) | | 5.1.1 5.1.3 5.1.4 5.1.6 | Sawmill Site Emissions | Very Good | Good | In accordance with NIR reporting, all sawmill site emissions from burning fossil fuels and biomass fuels are recorded and converted to CO2e. CO2 from biomass burning is excluded, but CH4 and N2O are included. Woodlands log loaders are included with the Sawmills loaders in this reporting. Other Woodlands fossil fuels from | ECCC 2021 EPA 2021 | | | | | |
| 5.1.9 | Harvested Wood Products | vod Very Good | Very Good Good | Emissions from net transfer of HWP in 2021 is the sum of the CO2e transferred in 2021 HWP manufacturing and the emissions of CO2e from HWP produced in prior years. The density of wood products was calculated using the species level percentages from the Irving forest inventory | ECCC 2020 FAO 2020 USA 2021 USDA 2020 Gonzalez 1990 | | | | | garages and local offices are no longer included in the Sawmill reporting. Fossil fuel consumption by invoice converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2021 for Canadian operations and OFR 2021 for US operations. | | | | | | |
| | | | | | | and tree species specific density factors from Gonzalez 1990 for the forest regions where Irving operates. The Emissions from previous years are estimated following guidance in A3.5.3 referenced and using a modified a simple decay approach from lumber, pulp, paper, corrugated medium and tissue using decay factors in developed from half-life factors in USA 2021 and U.S. A weighted average half-life was produced using solid wood products end use data from USDA 2020. Canadian end use of lumber products is assumed to be the same as US end use. Due to the integrated supply chain, Kraft pulp is used internally in both tissue and paper, so only Kraft pulp sold externally is modeled as pulp. Kraft pulp used internally is modeled in its end use tissue or paper. | | 5.2.1 | Sawmill Site Emissions | Very Good | Very Good | Electricity consumption for Sawmill sites from the Sawmill financial records and invoices converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 for Canadian operations and EPA 2022 for US operations. | ECCC 2021 EPA 2021 | | | |
| | | | | weighted average half-life was produced using solid wood products end use data from USDA 2020. Canadian end use of lumber products is assumed to be the same as US end use. Due to the integrated supply chain, Kraft pulp is used internally in both tissue and paper, so only Kraft pulp sold externally is modeled as pulp. Kraft pulp used internally is modeled in its end use tissue or | weighted average half-life was produced using solid wood products end use data from USDA 2020. Canadian end use of lumber products is assumed to be the same as US end use. Due to the integrated supply chain, Kraft pulp is used internally in both tissue and paper, so only Kraft pulp sold externally is modeled as pulp. Kraft pulp used internally is modeled in its end use tissue or | | | 5.1.1 5.1.3 5.1.4 5.1.6 | Pulp and Paper Site Emissions | Very Good | Very Good | In accordance with GHGRP reporting, all pulp and paper site emissions from burning fossil fuels and Biogenic fuels are recorded and converted to CO2e. CO2 from Biogenic fuels are excluded, but CH4 and N2O are included. Fossil fuel consumption by invoice converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 for Canadian operations. | ECCC 2021 | | | |
| 5.2.1 | Woodlands Electricity | Good | Very Good | Electricity consumption for Woodlands sites from the Woodlands financial records and invoices converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 for Canadian operations and EPA 2022 for US operations. Woodlands is reporting their own | ECCC 2021 EPA 2021 | 5.2.1 | Pulp and Paper Site Emissions | Very Good | Very Good | In accordance with GHGRP reporting, electricity consumption for pulp and paper sites from the Pulp and Paper Site financial records and invoice converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 for Canadian operations. | ECCC 2021 | | | | | |
| | | | | emissions in 2021 and are no longer included in Sawmills. | | 5.1.1 5.1.3 | Consumer Products | Very Good | Very Good | In accordance with GHGRP reporting, all Consumer Products site emissions from burning | ECCC 2021 EPA 2021 | | | | | |
| 5.3.5 5.3.6 5.3.7 | Sawmill Residual Freight and Pellet Freight, Horticultural product freight. | Very Good | Fair Emissions from truck freight for Residual chips, hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to customers by truck or rail. Data source is tonnes | hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to customers by truck or rail. Data source is tonnes | hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to customers by truck or rail. Data source is tonnes | hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to customers by truck or rail. Data source is tonnes | hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to customers by truck or rail. Data source is tonnes | hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to | hog fuel, sawdust, shavings, to internal and external customers and pellet freight to the Port of Belldune and horticultural products shipped to customers by truck or rail. Data source is tonnes | EPA 2021 | 5.1.4 5.1.6 | Emissions | | | fossil fuels converted to CO2e. Fossil fuel consumption by invoice converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 for Canadian operations and EPA 2022 for US operations. | |
| | | | | and route kilometers converted to tonnes of GHG and using the kg/CO2e by Tonne-km factor referenced. | | 5.2.1 | Consumer Products Emissions | Very Good | Very Good | Electricity consumption for Consumer Products sites from the Consumer Products financial records and invoices converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 for Canadian operations and EPA 2022 for US operations. | ECCC 2021 EPA 2021 | | | | | |

| ATEGORY | EMISSION/ REMOVAL | ACTIVITY DATA QUALITY | EMISSION FACTOR QUALITY | REPORTING OR CALCULATION METHODOLOGY | REFERENCES | | CATEGORY | EMISSION/ REMOVAL | ACTIVITY DATA QUALITY | EMISSION FACTOR QUALITY | REPORTING OR CALCULATION METHODOLOGY | REFERENC | | | | |
|---------|--|-----------------------------|-------------------------------|---|-------------------------|--|-----------------|----------------------------|-----------------------------|-------------------------------|---|---|------|--|--|------------------------|
| 5.3.14 | Pulp and Paper Chemical Use | Good | Fair | Cradle to gate GHG emissions from chemical purchases in the pulp and paper division for the chemicals referenced are recorded and converted | Tomberlin et al 2020 | | 5.1.8 5.3.12 | Corporate Air Trave | l Good | Good | Corporate air travel in the forest products supply chain – both commercial and corporate flights. | ECCC 2021 | | | | |
| | | | | to GHG using the factors provided in 2020, to calculate a CO2e/kg of chemicals used factor. Chemical use reported as purchased chemicals converted to dry kilograms and converted to GHG using the 2020 factor for emissions per kg for pulp and paper mills. | | | | 5.3.13 | Employee Commuting | | | Good | Fair | Emissions estimated for employee commuting using the number of employees in the supply chain minus the number of company vehicles (Scope 1) and the assumption that each employee vehicle is used only for work commuting, calculating the emissions as | EPA 2018-2 | |
| 5.3.9 | Pulp and Paper Freight to | Good | Fair | GHG emissions from freight of Kraft pulp, paper, corrugated medium to customers (internal and | EPA 2021 | | | | | | referenced for per vehicle per year of 4.6 metric tonnes CO2e per vehicle for 5/7 days per week. | | | | | |
| | Customers | | | external). ADMT of Kraft pulp, paper, corrugated medium via rail, truck, and ship by distance. Calculate emissions from factors referenced kg CO2e/tonne- km. Intermodal assumed to be the | | | 5.3.15 | Waste Disposal | Good | Good | Tonnes of commercial/industrial waste disposed of in a landfill. | EPA 2021 | | | | |
| | | | | same as rail. | | | 5.3.16 | Capital Goods Purchased | | | | | Good | Fair | Cradle to gate emissions from upstream supply chain purchases of capital goods for | EPA 2021 USCB 2022 |
| 5.3.14 | Consumer Products Chemical Use | Good | Fair | Cradle to gate GHG emissions from chemical purchases in Consumer Products for the chemicals listed in Tomberlin et al (2020) are recorded and converted to GHG using the factors provided in 2020, to calculate a CO2e/kg of chemicals used factor. Chemical use reported as purchased chemicals converted to dry kilograms and converted to GHG using the 2020 factor for emissions per kg for tissue mills. | Tomberlin et al 2020 | | | | | | | | | | manufacturing facilities using annual spending and referenced kg/CO2e per USD spent (2018) factor for sector 3332 – Machinery for the paper, textile, food, and other industries (except semiconductor manufacturing). Industry sector selected following (US Census Bureau 2021) "3332 Industrial Machinery Manufacturing: This industry comprises establishments primarily engaged in manufacturing industrial machinery, such as food and beverage manufacturing machinery, semiconductor manufacturing | BOC 2022 USBLS 2022 |
| 5.3.10 | Consumer Products Pulp and parent roll purchases | Very Good | Good | Emissions from purchases of parent rolls from external suppliers in tonnes, using published emissions factors. Pulp, fluff pulp and parent roll purchases from the internal accounting systems. Emissions factors for parent roll purchases from Table 7 in the referenced paper. | Tomberlin et al 2020 | | | | | | machinery, sawmill and woodworking machinery (except handheld), machinery for making paper and paper products, printing and binding machinery and equipment, textile making machinery, and machinery for making plastics and rubber products." | | | | | |
| 5.3.10 | Consumer Products Pulp purchases | Very Good | Fair | Emissions from purchases of eucalyptus pulp from external suppliers in tonnes, using emission factor from unpublished source. Pulp from internal accounting systems. Comparative Life Cycle Assessment of J.D. Irving, Limited (JDI) Northern Softwood and Hardwood Pulp and Selected Alternative Pulp Fibers for Premium Tissue Making. | Ayer and Laurin 2020 | | 5.3.17 Se | | Good | Fair | Cradle to gate emissions from upstream supply chain purchases of consumable goods (parts, wear items, etc.) using annual spending and referenced kg/CO2e per USD spent (2018) factor for sector 4238 (EPA 2021). Industry sector selected following (US Census Bureau 2021) "Machinery, Equipment, and Supplies Merchant Wholesalers: This industry group comprises establishments primarily engaged in the | EPA 2021 USCB 2022 BOC 2022 USBLS 2022 | | | | |
| 5.3.11 | Consumer Products Freight to Customers (internal) | Very Good | Fair | Parent roll transportation between Tissue mills. Parent roll usage from internal accounting systems reporting. Calculate emissions from factors referenced. Freight is by truck. | EPA 2021 | | | | | | | | | merchant wholesale distribution of construction, mining, farm, garden, industrial, service establishment, and transportation machinery, equipment, and supplies." Services sector (US Census Bureau 2021) sector 8113 "Commercial and Industrial Machinery and Equipment Repair | | |
| 5.1.3 | Corporate Head Office Fuels | Good | Good | Fuels used in heating office buildings allocated for Pulp & Paper, Sawmills, Woodlands, Consumer Products, and a proportion of corporate services used in the supply chain for Saint John and Moncton head offices. | ECCC 2021 EPA 2021 | | | | | | and Mustrial Machinery and Equipment Repair and Maintenance". "Fertilizers" and "Pesticides" factors used to convert Woodland's nursery and Forest Management use of chemicals. | | | | | |
| 5.2.2 | Corporate Head Office Electricity | Good | Very Good | Electricity consumption by invoice converted to CO2e using kgCO2/kwh by jurisdiction, following the guidance in ECCC 2022 | ECCC 2021 OFR 2021 | | | | | | | | | | | |

| CATEGORY | EMISSION/ REMOVAL | ACTIVITY DATA QUALITY | EMISSION FACTOR QUALITY | REPORTING OR CALCULATION METHODOLOGY | REFERENCES |
|----------|---|-----------------------------|---|--|---|
| 5.3.18 | Upstream Emissions from Purchased Fuels | Good | Fair | Emissions associated with the upstream extraction and distribution of Scope 1 fuels and Scope 2 electricity. Fuel volumes and electricity are converted to GJ using GHGenius and application of upstream emissions factors form GHGenius for High Heating Value and emissions from the upstream fuel cycle. The percentage of fuel for each electrical grid was determined and emissions for upstream electricity fuels calculated. | ECCC 2021 EPA 2021 GHGenius 2022 |
| 5.3.19 | Plastic Manufacturing Inputs | Very Good | Fair | Cradle to gate emissions from upstream supply chain purchases of plastic manufacturing inputs (325111) used in the manufacturing of diapers using annual spending and referenced kg/ CO2e per USD spent (2018) factor for sectors referenced (EPA 2021). | EPA 2021 USCB 2022 BOC 2022 USBLS 2022 |
| 5.3.20 | Consumer Packaging | Very Good | Very GoodFairCradle to gate emissions from upstream supply chain purchases of cardboard packaging (322210), adhesives and plastic wraps (326110), and SGA and marketing expenses (550000) using annual spending and referenced kg/CO2e per USD spent (2018) factor for sectors referenced (EPA 2021). | | EPA 2021 USCB 2022 BOC 2022 USBLS 2022 |
| 5.3.21 | Upstream and Downstream Leased Assets | Very Good | Fair | Cradle to gate emissions from upstream (office space) and downstream (warehousing) assets. Using annual spending from financial statements spending and referenced kg/CO2e per USD spent (2018) factor for sector 493 "Warehousing and Storage" and sector 531 rental of "Other Real Estate". Includes additional heating and electricity emissions where required in lease. | EPA 2021 USCB 2022 BOC 2022 USBLS 2022 |
| 5.1.8 | Peat Emissions (land use) | Very Good | Good | Land use change emissions from peat bog following the guidance of Dessureault et al, 2020. | Dessureault et. al 2020 |

APPENDIX C: QUANTIFICATION OF HWP AND NET FOREST GROWTH REMOVAL

C.1. HARVESTED WOOD PRODUCTS

TABLE C.1 REFERENCE HALF-LIFE (YEARS) FOR HWP

| FOREST PRODUCT | HALF-LIFE (YEARS) |
|--|-------------------|
| Wood in Single Family Houses - 1960-1979 | 81.9 |
| Wood in Single Family Houses - 1980 + | 83.9 |
| Multi-Family and Non- Residential (per cent of single family) | 0.61 |
| ovations and Remodeling (per cent of single family) | 0.30 |
| Other Sawnwood - USA | 38 |
| Pulp and Paper - Canada | 2 |
| Pulp and Paper - USA | 3 |

Renova

TABLE C.2 CALCULATED HALF-LIFE (YEARS) USED FOR HWP

| FOREST PRODUCT | HALF- LIFE USED (YEARS) | UNCERTAINTY | QUALITY |
|--------------------|-------------------------------|--------------------------|----------------------|
| Lumber (Pre-1980) | 51.42 | Activity Data | Very Good to Good |
| Lumber (Post-1980) | 48.49 | | |
| Kraft Pulp | 2.90 | Emissions Factor Data | Good to Fair |
| Corrugated Medium | 2.50 | | |
| Paper | 2.87 | | |
| Tissue | 2.50 | | |

TABLE C.3 DATA QUALITY ASSESSMENT FOR UNCERTAINTY ANALYSIS

C.2. PRODUCING CARBON YIELDS USING CBM-CFS3

Carbon yields were produced using the Carbon Budget Model of the Canadian Forest Sector (CBM-CFS3). This is an operational scale aspatial modeling framework that simulates the dynamics of the forest sector carbon stocks: above and below ground biomass, litter and dead wood, soil, and organic carbon. The model applies carbon estimation methods outlined in the Intergovernmental Panel on Climate Change (IPCC).

The CBM-CFS3 requires aspatial forest inventory data including the following:

• Inventory of key development types by leading species and average age

- Merchantable growth and yield curves for each key development type
- Land use change information
- Transition matrices
- Natural disturbance information

The carbon pools modeled in CBM-CFS3 are outlined below. Arrows show the direction of transfer from one pool to another including the atmosphere, starting with softwood (SW) and hardwood (HW) trees. The general rate of decay is indicated (from very fast to slow) for the pool.

C.3. UNCERTAINTY

Table C.4 below summarizes the general estimated from the merchantable volume, so the uncertainty used in the pedigree matrix approach. activity data quality is reduced. Estimates made Some slight modifications were used from these from measured data were considered better than general summaries based on expert opinion estimates from sampled data. Similarly, the dead within the uncertainty tool. However, if data was organic matter (DOM) is estimated and was not measured by LiDAR, it was considered very good. considered as good as other biomass. Emissions If it was estimated from traditional sampling factors are national factors from the CBM-CFS3 methods, it was not considered very good. The model and are considered good. other biomass (above and below ground) was

TABLE C.4 ACTIVITY DATA QUALITY ASSESSMENT FOR UNCERTAINTY ANALYSIS

| POOL | COMMENT | ACTIVITY DATA QUALITY | EMISSIONS FACTOR QUALITY |
|-----------------------------|------------------------------|--------------------------|-----------------------------|
| NB Freehold Merchantable | Measured with LiDAR | Very Good | Good |
| ME Freehold Merchantable | Measured with LiDAR | Very Good | Good |
| NS Freehold Merchantable | Sampled data | Very Good, Good, Poor | Good |
| NB Other Biomass | Estimated from measured data | Very Good, Good | Good |
| ME Other Biomass | Estimated from measured data | Very Good, Good | Good |
| NS Other Biomass | Estimated from sampled data | Very Good, Good, Fair | Good |
| NB DOM | Estimated from measured data | Very Good, Good, Fair | Good |
| ME DOM | Estimated from measured data | Very Good, Good, Fair | Good |
| NS DOM | Estimated from sampled data | Very Good, Good, Poor | Good |
| License 7 Merchantable | Measured with LiDAR | Very Good | Good |
| License 7 Other biomass | Estimated from measured data | Good | Good |
| License 7 DOM | Estimated from measured data | Fair | Good |

More detail including a bibliography regarding the forest inventory and forest carbon modeling can be found in the 2020 QES www.jdirvingsustainability/2020



FIGURE 11. CBM-CFS3 CARBON POOLS AND FLOW

APPENDIX D: EMISSIONS/(REMOVALS) DETAIL

TABLE D.1 DIRECT AND INDIRECT EMISSIONS

| DIVISION | EMISSIONS | SCOPE | TONNES | % |
|-----------------------------------|-------------------------------------|-------|-----------|-------|
| Woodlands | Direct Fuels | 1 | 9,932 | 0.5% |
| Sawmills | Direct Fuels | 1 | 37,702 | 1.9% |
| Pulp and Paper | Direct Fuels | 1 | 171,776 | 8.4% |
| Consumer Products | Direct Fuels | 1 | 233,657 | 11.5% |
| b Total: Scope 1 | | | 453,067 | 22.2% |
| Woodlands | Electricity | 2 | 979 | 0.0% |
| Sawmills | Electricity | 2 | 60,946 | 3.0% |
| Pulp and Paper | Electricity | 2 | 379,049 | 18.6% |
| Consumer Products | Electricity | 2 | 144,681 | 7.1% |
| b Total: Scope 2 | | | 585,655 | 28.8% |
| Woodlands | Wood procurement | 3 | 132,598 | 6.5% |
| Sawmill | Residue freight | 3 | 46,417 | 2.3% |
| Sawmill | Freight to customers | 3 | 46,703 | 2.3% |
| Sawmill | Pellet freight to port | 3 | 7,669 | 0.4% |
| Pulp and Paper | Freight to customers | 3 | 79,365 | 3.9% |
| Pulp and Paper | Chemicals | 3 | 59,404 | 2.9% |
| Consumer Products | Chemicals | 3 | 8,204 | 0.4% |
| Consumer Products | Finished goods to customers | 3 | 67,459 | 3.3% |
| Consumer Products | Internal freight | 3 | 7,148 | 0.4% |
| Consumer Products | Pulp and parent roll purchases | 3 | 94,825 | 4.7% |
| Consumer Products | Plastics | 3 | 72,308 | 3.5% |
| Consumer Products | Consumer Packaging & Marketing | 3 | 68,754 | 3.4% |
| All | Air Travel and Rentals (commercial) | 3 | 700 | 0.0% |
| All | Capital spending | 3 | 111,455 | 5.5% |
| All | Supply chain consumables | 3 | 27,774 | 1.4% |
| All | Employee commuting | 3 | 15,539 | 0.8% |
| All | Upstream fuel emissions | 3 | 119,681 | 5.9% |
| All | Leased assets (warehousing) | 3 | 22,380 | 1.1% |
| All | Waste disposal | 3 | 9,846 | 0.5% |
| ub Total: Scope 3 | | | 998,229 | 49.0% |
| TOTAL EMISSIONS: SCOPE 1, 2 AND 3 | | | 2,036,951 | 100% |

| DIVISION | EMISSIONS | SCOPE | TONNES | % |
|-----------------------------------|-------------------------------------|-------|---------|-------|
| Woodlands | Direct Fuels | 1 | 9,932 | 0.5% |
| Sawmills | Direct Fuels | 1 | 37,702 | 1.9% |
| Pulp and Paper | Direct Fuels | 1 | 171,776 | 8.4% |
| Consumer Products | Direct Fuels | 1 | 233,657 | 11.5% |
| b Total: Scope 1 | | | 453,067 | 22.2% |
| Woodlands | Electricity | 2 | 979 | 0.0% |
| Sawmills | Electricity | 2 | 60,946 | 3.0% |
| Pulp and Paper | Electricity | 2 | 379,049 | 18.6% |
| Consumer Products | Electricity | 2 | 144,681 | 7.1% |
| b Total: Scope 2 | | | 585,655 | 28.8% |
| Woodlands | Wood procurement | 3 | 132,598 | 6.5% |
| Sawmill | Residue freight | 3 | 46,417 | 2.3% |
| Sawmill | Freight to customers | 3 | 46,703 | 2.3% |
| Sawmill | Pellet freight to port | 3 | 7,669 | 0.4% |
| Pulp and Paper | Freight to customers | 3 | 79,365 | 3.9% |
| Pulp and Paper | Chemicals | 3 | 59,404 | 2.9% |
| Consumer Products | Chemicals | 3 | 8,204 | 0.4% |
| Consumer Products | Finished goods to customers | 3 | 67,459 | 3.3% |
| Consumer Products | Internal freight | 3 | 7,148 | 0.4% |
| Consumer Products | Pulp and parent roll purchases | 3 | 94,825 | 4.7% |
| Consumer Products | Plastics | 3 | 72,308 | 3.5% |
| Consumer Products | Consumer Packaging & Marketing | 3 | 68,754 | 3.4% |
| All | Air Travel and Rentals (commercial) | 3 | 700 | 0.0% |
| All | Capital spending | 3 | 111,455 | 5.5% |
| All | Supply chain consumables | 3 | 27,774 | 1.4% |
| All | Employee commuting | 3 | 15,539 | 0.8% |
| All | Upstream fuel emissions | 3 | 119,681 | 5.9% |
| All | Leased assets (warehousing) | 3 | 22,380 | 1.1% |
| All | Waste disposal | 3 | 9,846 | 0.5% |
| ub Total: Scope 3 | | | 998,229 | 49.0% |
| TOTAL EMISSIONS: SCOPE 1, 2 AND 3 | | | | 100% |

| · · · · · · · | | | _ ,_ _ _ | |
|-------------------------------------|--|-----|-------------------|---------------|
| ıb Total: Scope 3 | | | 998,229 | 49.0% |
| All | Waste disposal | 3 | 9,846 | 0.5% |
| All | Leased assets (warehousing) | 3 | 22,380 | 1.1% |
| All | Upstream fuel emissions | 3 | 119,681 | 5.9% |
| All | Employee commuting | 3 | 15,539 | 0.8% |
| All | Supply chain consumables | 3 | 27,774 | 1.4% |
| All | Capital spending | 3 | 111,455 | 5.5% |
| All | Air Travel and Rentals (commercial) | 3 | 700 | 0.0% |
| Consumer Products | Consumer Packaging & Marketing | 3 | 68,754 | 3.4% |
| Consumer Products | Plastics | 3 | 72,308 | 3.5% |
| Consumer Products | Pulp and parent roll purchases | 3 | 94,825 | 4.7% |
| Consumer Products | Internal freight | 3 | 7,148 | 0.4% |
| Consumer Products | Finished goods to customers | 3 | 67,459 | 3.3% |
| Pulp and Paper Consumer Products | Chemicals | 3 | 59,404 8,204 | 0.4% |
| | Chemicals | 3 | | 2.9% |
| Pulp and Paper | Freight to customers | 3 | 7,669 | 0.4% 3.9% |
| Sawmill | Freight to customers Pellet freight to port | 3 | 46,703 7,669 | 2.3% |
| Sawmill | Residue freight | 3 | 46,417 | 2.3% |
| Woodlands | Wood procurement | 3 | 132,598 | 6.5% |
| - | | | | |
| Total: Scope 2 | Licencity | L 2 | 585,655 | 28.89 |
| Consumer Products | Electricity | 2 | 144,681 | 7.1% |
| Pulp and Paper | Electricity | 2 | 60,946 379,049 | 3.0% 18.6% |
| Woodlands Sawmills | Electricity | 2 | 979 | 0.0% |
| o Total: Scope 1 | | | - | |
| | 2.000.1200 | _ | 453,067 | 22.2% |
| Consumer Products | Direct Fuels | 1 | 233,657 | 11.5% |
| Pulp and Paper | Direct Fuels | 1 | 171,776 | 8.4% |
| Woodlands Sawmills | Direct Fuels Direct Fuels | 1 | 9,932 37,702 | 0.5% 1.9% |
|) M/a a dlava da | Direct Fuels | 1 | 0.022 | 0.5% |



TABLE D.2 DIRECT AND INDIRECT EMISSIONS HISTORY

| DIVISION | EMISSION | 2020 TONNES | 2021 TONNES | % CHANGE |
|--------------------|---|-------------|--------------------|----------|
| Woodlands | Direct Fuels ^a | - | 9,932 37,702 | N/A |
| Sawmills | Direct Fuels ^a | - | 37,702 | N/A |
| Sawmills/Woodlands | Direct Fuels ^a | 31,616 | 47,634 | 51% |
| Pulp and Paper | Direct Fuels | 165,710 | 171,776 233,657 | 4% |
| Consumer Products | Direct Fuels ^{c,d} | 193,065 | 233,657 | 21% |
| All | Air travel (Corporate) ^b | 190 | - | N/A |
| Head Office | Direct Fuels ^b | 279 | - | N/A |
| Sub Total: Scope 1 | | 390,860 | 453,067 | 16% |
| Head Office | Electricity ^b | 276 | - | N/A |
| Woodlands | Electricity ^a | - | 979 | N/A |
| Sawmills | Electricity ^a | - | 60,946 | N/A |
| Sawmills/Woodlands | Electricity ^a | 52,852 | 61,925 | 17% |
| Pulp and Paper | Electricity | 323,093 | 379,049 | 17% |
| Consumer Products | Electricity ^{c,d} | 133,576 | 144,681 | 8% |
| Sub Total: Scope 2 | | 509,797 | 585,655 | 15% |
| Woodlands | Wood procurement | 128,585 | 132,598 | 3% |
| Sawmill | Residue freight | 39,241 | 46,417 | 18% |
| Sawmill | Freight to customers | 43,148 | 46,703 | 8% |
| Sawmill | Peat & Pellet freight to customers ^d | 6,743 | 7,669 | 14% |
| Pulp and Paper | Freight to customers | 127,424 | 79,365 | -38% |
| Pulp and Paper | Chemicals | 60,364 | 59,404 | -2% |
| Consumer Products | Chemicals | 6,005 | 8,204 | 37% |
| Consumer Products | Finished goods to customers ^{d,f} | 25,762 | 67,459 | 162% |
| Consumer Products | Internal freight | 8,256 | 7,148 | -13% |
| Consumer Products | Pulp and parent roll purchases $^{\rm d}$ | 95,292 | 94,825 | 0% |
| Consumer Products | Plastics (Diapers) ^d | - | 72,308 | New |
| Consumer Products | Consumer Packaging & Marketing ^f | - | 68,754 | New |

| TOTAL EMISSIONS: SO | COPE 1, 2 AND 3 | 1,809,229 | 2,036,951 | 13% |
|---------------------------------|-------------------------------------|-------------|-------------|---------|
| Sub Total: Scope 3 ^c | | 908,572 | 998,229 | 10% |
| All | Waste disposal | 7,225 | 9,846 | 36% |
| All | Leased assets (warehousing) | 15,720 | 22,380 | 42% |
| All | Upstream fuel emissions | 101,393 | 119,681 | 18% |
| All | Employee commuting | 11,881 | 15,539 | 31% |
| All | Supply chain consumables | 21,102 | 27,774 | 32% |
| All | Capital spending | 120,420 | 111,455 | -7% |
| All | Air Travel and Rentals (commercial) | 594 | 700 | 18% |
| DIVISION | EMISSION | 2020 TONNES | 2021 TONNES | % CHANC |

TABLE D.3 REPORTING CHANGES FROM 2020

| NOTE | CATEGORY | |
|------|----------------------------|----------------------|
| а | Woodlands/Sawmills | 2021 Some Wood |
| b | Head Office and air travel | Head in 202 |
| С | Consumer Products | 2020 Sectio |
| d | Consumer Products | Additi |
| e | Sawmills | Bound and/o |
| f | Consumer Products | Additi (See E |

EXPLANATION

is the first year Woodlands is reporting its own emissions. Woodlands emissions reported in previous years in Sawmills. dlands/Sawmills reported to allow comparison to previous year.

I Office and corporate air travel are reported within each Division)21.

baseline restated to include additional operations as per policy in ion 6.8 (see D.4 below for impact)

tion of IPC and JOL has resulted in additional emissions categories

ndary expansion to include JOL resulting in additional categories or emissions

tion or improvement to reporting emissions category from 2020 D.4 below for impact)



TABLE D.4 MAJOR EMISSIONS INCREASES FROM 2020

| EMISSION CATEGORY | DETAIL | SCOPE 1 TONNES | SCOPE 2 TONNES | SCOPE 3 TONNES | TOTAL TONNES |
|--|--|-------------------|-------------------|-------------------|----------------------|
| Sawmills Direct | GLT Boiler Failure | 13,091 | | | 13,091 |
| Consumer Products Direct & Indirect | Start-up of Tissue Machine #2 at Macon | 8,770 | 11,402 | | 20,172 |
| Consumer Products | Boundary expansion to include Irving Personal Care – (2020 Base year emissions restated as per policy in Section 6.8) | 76 | 5,653 | 101,029 | 106,758 ¹ |
| Sawmills | Boundary expansion to include Juniper Organics Limited | 286 | 330 | 4,280 | 4,896 |
| Consumer Products Scope 3 | Addition of consumer packaging in 2021 | | | 57,732 | 57,732 |
| Consumer Products Scope 3 | Addition of pallets and packaging in calculating Freight based emissions in 2021 ² | | | 13,885 | 13,885 |
| Scope 2 | Emissions factor changes ³ | | 46,490 | | 46,490 |
| TOTAL | | 22,223 | 63,875 | 176,926 | 263,024 |

¹2020 Base year emissions restated based on production difference between 2020 v. 2021.

²2020 emissions estimated by pro-rating 2021 emissions based on the annual difference in the mass of converted tissue shipped in 2021 (without pallets)

³2020 Emissions estimated by pro-rating the 2021 emissions based on the annual difference in the electricity emissions factor.

TABLE D.5 HWP TRANSFER AND NET FOREST GROWTH **EMISSIONS/(REMOVALS) DETAIL**

| DIVISION | TRANSFER / EMISSION | 2020 TONNES | 2021 TONNES |
|---|---|-------------|-------------|
| Sawmill | HWP – Lumber | (441,977) | (428,170) |
| Pulp and Paper | HWP – Kraft pulp | 23,510 | (12,846) |
| Pulp and Paper | HWP – Corrugating medium | (14,827) | 15,436 |
| Pulp and Paper | HWP – Paper | 224 | (15,751) |
| Consumer Products | HWP – Tissue Products | (154,464) | (105,020) |
| Sub-Total: Transfer to HWP | | (587,532) | (546,351) |
| Woodlands - Freehold | Softwood Merchantable Emission/(Removal) | (1,207,287) | (1,292,072) |
| Woodlands - Freehold | Hardwood Merchantable Emission/(Removal) | (244,900) | (261,713) |
| Woodlands - Freehold | Other Biomass Emission/(Removal) | (1,762,961) | (1,663,338) |
| Woodlands - Freehold | DOM Emission/(Removal) | 879,865 | 616,681 |
| Juniper Organics Limited ¹ | Peat Bog Land Use Change Emission/(Removal) | N/A | 3,313 |
| Sub-Total: Net Fore | st Growth and Land Use – Freehold | (2,335,282) | (2,476,711) |
| Total: HWP transfe | r plus Net Forest Growth Emissions/(Removals) | (2,922,814) | (3,023,062) |
| Woodlands – License 7 | Softwood Merchantable Emission/(Removal) | (1,367,441) | (1,020,677) |
| Woodlands – License 7 | Hardwood Merchantable Emission/(Removal) | (389,338) | (225,063) |
| Woodlands – License 7 | Other Biomass Emission/(Removal) | (1,920,718) | (1,245,741) |
| Woodlands - License 7 | DOM Emission/(Removal) | 1,228,829 | 1,001,115 |
| Sub Total: Net Forest Growth (Crown License 7) ² | | (2,448,668) | (1,556,092) |

| DIVISION | TRANSFER / EMISSION | 2020 TONNES | 2021 TONNES |
|---|---|-------------|-------------|
| Sawmill | HWP – Lumber | (441,977) | (428,170) |
| Pulp and Paper | HWP – Kraft pulp | 23,510 | (12,846) |
| Pulp and Paper | HWP - Corrugating medium | (14,827) | 15,436 |
| Pulp and Paper | HWP – Paper | 224 | (15,751) |
| Consumer Products | HWP – Tissue Products | (154,464) | (105,020) |
| Sub-Total: Transfer to HWP | | (587,532) | (546,351) |
| Woodlands – Freehold | Softwood Merchantable Emission/(Removal) | (1,207,287) | (1,292,072) |
| Woodlands - Freehold | Hardwood Merchantable Emission/(Removal) | (244,900) | (261,713) |
| Woodlands - Freehold | Other Biomass Emission/(Removal) | (1,762,961) | (1,663,338) |
| Woodlands – Freehold | DOM Emission/(Removal) | 879,865 | 616,681 |
| Juniper Organics Limited ¹ | Peat Bog Land Use Change Emission/(Removal) | N/A | 3,313 |
| Sub-Total: Net Fore | st Growth and Land Use – Freehold | (2,335,282) | (2,476,711) |
| Total: HWP transfe | r plus Net Forest Growth Emissions/(Removals) | (2,922,814) | (3,023,062) |
| Woodlands – License 7 | Softwood Merchantable Emission/(Removal) | (1,367,441) | (1,020,677) |
| Woodlands – License 7 | Hardwood Merchantable Emission/(Removal) | (389,338) | (225,063) |
| Woodlands - License 7 | Other Biomass Emission/(Removal) | (1,920,718) | (1,245,741) |
| Woodlands – License 7 | DOM Emission/(Removal) | 1,228,829 | 1,001,115 |
| Sub Total: Net Forest Growth (Crown License 7) ² | | (2,448,668) | (1,556,092) |

| DIVISION | TRANSFER / EMISSION | 2020 TONNES | 2021 TONNES |
|---|---|-------------|-------------|
| Sawmill | HWP – Lumber | (441,977) | (428,170) |
| Pulp and Paper | HWP – Kraft pulp | 23,510 | (12,846) |
| Pulp and Paper | HWP – Corrugating medium | (14,827) | 15,436 |
| Pulp and Paper | HWP – Paper | 224 | (15,751) |
| Consumer Products | HWP - Tissue Products | (154,464) | (105,020) |
| Sub-Total: Transfer to HWP | | (587,532) | (546,351) |
| Woodlands - Freehold | Softwood Merchantable Emission/(Removal) | (1,207,287) | (1,292,072) |
| Woodlands - Freehold | Hardwood Merchantable Emission/(Removal) | (244,900) | (261,713) |
| Woodlands - Freehold | Other Biomass Emission/(Removal) | (1,762,961) | (1,663,338) |
| Woodlands - Freehold | DOM Emission/(Removal) | 879,865 | 616,681 |
| Juniper Organics Limited ¹ | Peat Bog Land Use Change Emission/(Removal) | N/A | 3,313 |
| Sub-Total: Net Fore | st Growth and Land Use – Freehold | (2,335,282) | (2,476,711) |
| Total: HWP transfe | r plus Net Forest Growth Emissions/(Removals) | (2,922,814) | (3,023,062) |
| Woodlands – License 7 | Softwood Merchantable Emission/(Removal) | (1,367,441) | (1,020,677) |
| Woodlands – License 7 | Hardwood Merchantable Emission/(Removal) | (389,338) | (225,063) |
| Woodlands – License 7 | Other Biomass Emission/(Removal) | (1,920,718) | (1,245,741) |
| Woodlands – License 7 | DOM Emission/(Removal) | 1,228,829 | 1,001,115 |
| Sub Total: Net Forest Growth (Crown License 7) ² | | (2,448,668) | (1,556,092) |

¹Emission included in Land Use Change instead of Scope 1 (Direct Emissions) ²Crown License 7 emissions/(removals) are shown for transparency. These emissions/(removal) are not counted in the Declaration of Carbon Neutrality.

TABLE D.6 BIOGENIC CO2 EMISSIONS DETAIL

| Total: Biogenic CO ₂ | | 1,551,491 | 1,340,178 |
|---------------------------------|-----------------------|--------------------|--------------------|
| Pulp and Paper | Biogas | 15,988 | 22,058 |
| Pulp and Paper | Pulping Liquor | 844,889 | 837,651 |
| Pulp and Paper | Waste Bark (Hog Fuel) | 253,677 | 242,558 |
| Sawmill | Waste Bark (Hog Fuel) | 436,937 | 237,911 |
| DIVISION | BIOGENIC EMISSION | 2020 TONNES CO_2 | 2021 TONNES CO_2 |

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APPENDIX E: REFERENCES

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APPENDIX F: QUALIFYING EXPLANATORY STATEMENT CHECKLIST

TABLE F.1 CHECKLIST FOR QES SUPPORTING DECLARATION OF COMMITMENT **TO CARBON NEUTRALITY**

| # | ITEMS | STATUS | SECTION IN THE QES |
|----|--|--------------|-----------------------|
| 1 | Identify the individual responsible for the evaluation and provision of data necessary for the substantiation of the declaration including that of preparing, substantiating, communicating, and maintaining the declaration. | \checkmark | 3.0 |
| 2 | Identify the entity responsible for making the declaration. | \checkmark | 3.0 |
| 3 | Identify the subject of the declaration. | \checkmark | 3.0 |
| 4 | Explain the rationale for the selection of the subject. (The selection of the subject should ideally be based on the broader understanding of the entire carbon footprint of the entity so that the carbon footprint of the selected subject can be seen in context; entities need to be able to demonstrate that they are not intentionally excluding their most significant GHG emissions (or alternatively can explain why they have done so)). | ~ | 3.0 |
| 5 | Define the boundaries of the subject. | \checkmark | 4.0 |
| 6 | Identify all characteristics (purposes, objectives, or functionality) inherent to that subject. | \checkmark | 3.1 |
| 7 | Identify and take into consideration all activities material to the fulfilment, achievement, or delivery of the purposes, objectives, or functionality of the subject. | \checkmark | 5.0 |
| 8 | Select which of the 3 options within PAS2060 you intend to follow. | \checkmark | 3.0 |
| 9 | Identify the date by which the entity plans to achieve the status of "carbon neutrality" of the subject and specify the period for which the entity intends to maintain that status. | \checkmark | 3.0 |
| 10 | Select an appropriate standard and methodology for defining the subject, the GHG emissions associated with that subject and the calculation of the carbon footprint of the defined subject. | \checkmark | 6.3 |
| 11 | Provide justification for the selection of the methodology chosen. (The methodology employed shall minimize uncertainty and yield accurate, consistent, and reproducible results. | \checkmark | 6.3 |
| 12 | Confirm that the selected methodology was applied in accordance with its provisions and the principles set out in PAS2060. | \checkmark | 1.0 |

| | # | ITEMS |
|--|----|---|
| | 13 | Describe the actual types of GHG emissions, cla 1, 2, or 3) and the size of the carbon footprint of purchases of carbon offsets. |
| | | a. All greenhouse gases shall be included |
| | | b. 100 per cent of the Scope 1 (direct) em shall be included when determining the |
| | | c. 100 per cent of the Scope 2 (indirect) e subject shall be included when determi |
| | | d. Where estimates of GHG emissions are of the subject carbon footprint (particu Scope 3 emissions) these shall be deter precludes underestimation. |
| | | e. Scope 1, 2 or 3 emissions sources estin per cent of the total carbon footprint sl unless evidence can be provided to der quantification would not be technically (Emissions sources estimated to constit excluded on that basis alone). |
| | | f. The quantified carbon footprint shall co emissions from the subject. |
| | | g. Where a single source contributes more emission, the 95 per cent threshold approved of emissions. |
| | | h. Any exclusion and the reason for that e |
| | 14 | Where the subject is an organization/company o |
| | | a. Boundaries are a true and fair represen GHG emissions (i.e., shall include all GH core operations including subsidiaries of organization). It will be important to en if an entity chooses a very narrow subje intensive activities or if it outsources it then this needs to be documented. |
| | | b. Either the equity share or control appro- which GHG emissions are included. Un the entity accounts for GHG emissions to its share of the equity in the subject. the entity shall account for 1005 of the has financial and/or operational contro |

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| STATUS | SECTION IN THE QES |
|--------------|-----------------------|
| \checkmark | 6.0 |
| \checkmark | 6.0 |
| \checkmark | 5.1 |
| \checkmark | 5.2 |
| \checkmark | 6.3 |
| ~ | 6.6 |
| \checkmark | 6.6 |
| N/A | N/A |
| \checkmark | 6.6 |
| | |
| ~ | 5.0 |
| ~ | 3.0 |
| | |

| # | ITEMS | STATUS | SECTION IN THE QES |
|----|--|--------------|-----------------------|
| 15 | Identify if the subject is part of an organization or a specific site or location and treat it as a discrete operation with its own purpose, objectives, and functionality. | \checkmark | 3.0 |
| 16 | Where the subject is a product or service, include all Scope 3 emissions (as the lifecycle of the product/service needs to be taken into consideration). | N/A | N/A |
| 17 | Describe the actual methods used to quantify GHG emissions (e.g., use the primary or secondary data), the measurement unit(s) applied, the period of application and the size of the resulting carbon footprint. (The carbon footprint shall be based as far as possible on primary activity data.) Where quantification is based on calculations (e.g., GHG activity data multiplied by greenhouse gas emissions factors or the use of mass balance/lifecycle models) then GHG emissions shall be calculated using emission factors from national (Government) publications. Where such factors are not available, international or industry guidelines shall be used. In all cases the sources of such data shall be identified. | ✓ | 6.3 |
| 18 | Provide details of and explanations for the exclusion of any Scope 3 emissions. | \checkmark | 6.6 |
| 19 | Document all assumptions and calculations made in quantifying the GHG emissions and in the selection or development of greenhouse gas emissions factors. (Emissions factors used shall be appropriate to the activity concerned and current at the time of quantification). | \checkmark | Appendix B |
| 20 | Document your assessments of uncertainty and variability associated with defining boundaries and quantifying GHG emissions including the positive tolerances adopted in association with emissions estimates. (The statement could take the form of a qualitative description regarding the uncertainty of the results, or a quantitative assessment of uncertainty if available (e.g., carbon footprint based on 95 per cent of greenhouse gas emissions: primary sources are subject to variation over time; footprint is best estimate based on reasonable costs of evaluation)). | ✓ | 6.7 |
| 21 | Document carbon footprint management plan: | \checkmark | 7.0 |
| | a. Make a statement of commitment to carbon neutrality for the defined subject. | \checkmark | 7.1 |
| | b. Set timescales for achieving carbon neutrality for the defined subject. | \checkmark | Already Achieved |
| | c. Specify targets for GHG reduction for the defined subject appropriate to the timescale for achieving carbon neutrality including the baseline date, the first qualification date and the first application period. | \checkmark | Already Achieved |
| | d. Document the planned means of achieving and maintaining GHG emissions reductions including assumptions made and any justification of the techniques and measures to be employed to reduce GHG emissions. | \checkmark | 7.3 |
| | e. Specify the offset strategy including an estimate of the quantity of GHG emissions to be offset, the nature of the offsets and the number and type of credits. | \checkmark | 7.4 |

| | # | ITEMS |
|--|----|--|
| | 22 | Implement a process for undertaking periodic asse against the Plan and for implementing corrective a achieved. The frequency of assessing performance commensurate with the timescale for achieving ca |
| | 23 | Where the subject is a non-recurring event such a identify ways of reducing GHG emissions to the m commensurate with the enabling of the event to m before the event takes place and include post even whether the expected minimization in emissions h |
| | 24 | For any reductions in the GHG emissions from the the period immediately prior to the baseline date at in any GHG emissions quantification (historic reductions). The period from which these reductions are a the required data is available and that a undertaken using the same methodology the the the assessment of historic reduction has with this PAS, reporting the quantity of hist parallel with the report of total reduction. |
| | 25 | Record the number of times that the declaration of renewed without declaration of achievement. |
| | 26 | Specify the type of conformity assessment: a. Independent third-party certification b. Other party validation c. Self-validation |
| | 27 | Include statements of validation where declaration neutrality are validated by a third-party certifier or |
| | 28 | Date the QES and have it signed by the senior rep concerned (e.g., CEO of a corporation; Divisional I is a division of a larger entity; the Chairman of a to household or family group). |
| | 29 | Make QES publicly available and provide a referent information upon which substantiation depends (e |
| | 30 | Update the QES to reflect changes and actions the the declaration of commitment to carbon neutraling the declaration neutraling the declaration of commitment to carbon neutraling the declaration of |

| | STATUS | SECTION IN THE QES |
|---|--------------|-----------------------|
| sessments of performance action to ensure targets are ce against the Plan should be carbon neutrality. | \checkmark | 7.2 |
| as weddings or concert, maximum extent meet its intended objectives ent review to determine has been achieved. | N/A | N/A |
| ne defined subject delivered in e and not otherwise considered ductions), confirm: re to be included; t calculations have been hroughout; has been made in accordance storic reductions claimed in | N/A | N/A |
| of commitment has been | \checkmark | 1.0 |
| | \checkmark | 3.0 |
| ons of commitment to carbon or second party organizations. | \checkmark | 1.0 |
| presentative of the entity Director, where the subject town council or head of the | ~ | 1.0 |
| ence to any freely accessible (e.g., via websites) | \checkmark | 1.0 |
| hat could affect the validity of lity. | \checkmark | 1.0 |

TABLE F.2 CHECKLIST FOR QES SUPPORTING DECLARATION OF ACHIEVEMENT **OF CARBON NEUTRALITY**

| # | ITEMS | STATUS | SECTION IN THE QES |
|----|--|--------------|-----------------------|
| 1 | Define standard and methodology use to determine its GHG emissions reduction. | N/A | N/A |
| 2 | Confirm that the methodology used was applied in accordance with its provisions and the principles set out in PAS 2060 were met. | \checkmark | 1.0 |
| 3 | Provide justification for the selection of the methodologies chosen to quantify reductions in the carbon footprint, including all assumptions and calculations made and any assessments of uncertainty. (The methodology employed to quantify reductions shall be the same as that used to quantify the original carbon footprint. Should an alternative methodology be available that would reduce uncertainty and yield more accurate, consistent, and reproducible results, then this may be used provided the original carbon footprint is requantified to the same methodology, for comparison purposes. Recalculated carbon footprints shall use the most recently available emissions factors, ensuring that for purposes of comparison with the original calculation, any change in the factors used is considered). | ~ | 6.0 |
| 4 | Describe how reductions have been achieved and any applicable assumptions or justifications. | \checkmark | 3.1.1 |
| 5 | Ensure that there has been no change to the definition of the subject. (The entity shall ensure that the definition of the subject remains unchanged through each of every stage of the methodology. If material change to the subject occurs, the sequence shall be re-stated based on a newly defined subject.) | N/A | N/A |
| 6 | Describe the actual reductions achieved in absolute and intensity terms and as a percentage of the original carbon footprint. (Quantified GHG emissions reductions shall be expressed in absolute terms and shall relate to the application period selected and/or shall be expressed in emission intensity terms (e.g. per specified unit of product or instance of service). | ~ | 3.1.1 |
| 7 | State the baseline/qualification date. | \checkmark | 3.0 |
| 8 | Record the percentage economic growth rate for the given application period use as a threshold for recognizing reductions in intensity terms. | N/A | N/A |
| 9 | Provide an explanation for circumstances where a GHG reduction in intensity terms is accompanied by an increase in absolute terms for the determined subject. | N/A | N/A |
| 10 | Select and document the standard and methodology used to achieve carbon offset. | \checkmark | 7.4 |

| # | ITEMS |
|----|--|
| 11 | Confirm that: |
| | a. Offsets generated or allowance credits surre additional GHG emissions reductions elsewh |
| | Projects involved in delivering offsets meet to permanence, leakage, and double counting. Gas Protocol for definitions of additionality, double counting). |
| | c. Carbon offsets are verified by an independer |
| | d. Credits from Carbon offset projects are only reduction has taken place. |
| | e. Credits from Carbon offset projects are retir the date of the declaration of achievement. |
| | f. Provision for event related option of 36 mor added here. |
| | g. Credits from Carbon offset projects are supp project documentation on a registry which s about the offset project, quantification meth verification procedures. |
| | h. Credits from Carbon offset projects are store independent and credible registry. |
| 12 | Document the quantity of GHG emissions credits of credits purchased including the number and typ period over with the credits were generated inclu |
| | a. Which GHG emissions have been offset |
| | b. The actual amount of carbon offset |
| | c. The type of credits and projects involved |
| | d. The number and type of carbon credits used which credits have been generated. |
| | e. For events, a rationale to support retirement months including details of any legacy emiss |
| | f. Information regarding the retirement/cancel prevent their use by others including a link to publicly available record, where the credit has |

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| | STATUS | SECTION IN THE QES |
|--|--------|-----------------------|
| | | |
| endered represent genuine, /here. | N/A | N/A |
| the criteria of additionality, . (See the WRI Greenhouse r, permanence, leakage, and | N/A | N/A |
| ent third-party certifier. | N/A | N/A |
| y issued after the emission | N/A | N/A |
| ired within 12 months from | N/A | N/A |
| onths (about 3 years) to be | N/A | N/A |
| ported by publicly available shall provide information hodology and validation and | N/A | N/A |
| red and retired in an | N/A | N/A |
| s and the type and nature ype of credits used and the uding" | N/A | N/A |
| | N/A | N/A |
| | N/A | N/A |
| | N/A | N/A |
| d and the period over | N/A | N/A |
| nt of credits in excess of 12 sions savings, considered. | N/A | N/A |
| ellation of carbon credits to to the registry or equivalent has been retired. | N/A | N/A |

| # | ITEMS | STATUS | SECTION IN THE QES |
|----|--|--------------|-----------------------|
| 13 | Specify the type of conformity assessment:a. Independent third party certification;b. Other party validation;c. Self-validation | ~ | 3.0 |
| 14 | Include statements of validation where declarations of achievement of carbon neutrality are validated by a third-party certifier or second party organizations. | \checkmark | 1.0 |
| 15 | Date the QES and have it signed by the senior representative of the entity concerned (e.g. CEO of a corporation, Divisional Director, where the subject is a division of a larger entity; the Chairman of a town council or the head of the household for a family group.) | ~ | 1.0 |
| 16 | Make QES publicly available and provide a reference to any freely accessible information upon which substantiation depends (e.g. via websites). | \checkmark | 1.0 |

TABLE F.3 QES OPENNESS AND CLARITY

| | ENTITIES SHOULD SATISFY THEMSELVES THAT THE QES | STATUS |
|----|---|--------------|
| 1. | Does not suggest a reduction which does not exist, either directly or by implication. | \checkmark |
| 2. | Is not presented in a manner which implies that the declaration is endorsed or certified by an independent third-party organization when it is not. | \checkmark |
| 3. | Is not likely to be misinterpreted or be misleading as a result of the omission of relevant facts. | \checkmark |
| 4. | Is readily available to any interested party. | \checkmark |

GLOSSARY OF TERMS

Biogenic: CO₂ emissions from the burning of biomass products. Energy is converted to steam for heating or drying (lumber, pulp, paper, Tissue). Waste steam may be used to generate electricity. Biogenic CO₂ emissions come from hog fuel and lignin.

biomass: plant material derived from trees.

Boundary: all Forest Management, Forest Products processing, manufacturing, related transportation, and administrative activities that support the production of lumber, wood pellets, Kraft pulp, paper, Tissue and corrugating medium products and related by-products under the equity control of Irving to the point of sale to third parties (Customers).

carbon: unless otherwise noted carbon means greenhouse gases (GHG) or carbon dioxide equivalents (CO₂e). In the case of forest or tree growth, carbon means CO₂ only.

Carbon Dioxide Equivalents (CO₂e): gases including carbon activities. dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O) and various fluorinated gases, also referred to as greenhouse forests: any forest ownership including Freehold, Crown gases (GHG). Gases are weighted by their individual global License 6 & 7. Other Crown lands, and Private Lands. warming potential (GWP) to equal a CO_2e .

Carbon Footprint: the accounting of GHG emission or removals within the Boundary

Carbon Neutral: condition in a stated period where there is no net increase in the global emissions of GHG to the atmosphere resulting from the GHG emissions and removals associated with the Boundary.

Carbon Neutrality: the state of being Carbon Neutral

chip (or wood chip): Residual product of sawmilling used to make pulp or paper products from conifer or deciduous logs. May also result from pulpwood converted to chips in mills or directly from low quality trees from the forest.

corrugating medium: paper that once combined on two sides by linerboard, forms the centre of cardboard box. Corrugating medium adds strength to cardboard boxes.

Crown License: New Brunswick provincial owned land, managed by a company with forest products manufacturing facilities in NB. The manager is responsible for all Forest Management activities and is referred to as the Licensee.

Crown License 6 & 7: New Brunswick Crown Licenses managed by J.D. Irving, Limited.

Customers: Irving's customers where the transfer of ownership occurs. This may be warehouses, distribution centres, ports, stores, brokers, wholesalers, other manufacturers, etc. For clarity, Irving's customers are not end-use retail consumers.

Direct and Indirect Emissions: Scope 1, 2 and 3 GHG emissions related to harvesting, processing, manufacturing, supply chain and freight to Customers.

Declaration: formal statement in respect of Carbon Neutrality

Forest Management (Forestry): all activities related to forest inventory, planning, road construction and harvesting, reforestation, stand improvement (precommercial and commercial thinning) and forest protection

Forest Products: finished and semi-finished wood-based products including lumber, pulp, paper, wood pellets, growing media, corrugating medium, Tissue, diapers, and products used to generate biomass energy including wood waste or hog fuel (e.g., scrap wood, bark, saw dust, shavings), or wood pellets.

Freehold: Irving owned private forest lands.

Greenhouse Gas (GHG): gases converted to Carbon Dioxide Equivalents (CO₂e) including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O) and various fluorinated gases, also referred to as Carbon Dioxide Equivalents (CO₂e). Gases are weighted by their individual global warming potential (GWP) to equal a GHG.

growing media: peat moss, soils, and mulch products used by in the horticultural and landscaping industries.

Harvested Wood Products (HWP): solid wood products like lumber and paper products like pulp, paper, corrugating medium and tissue that transfer and store carbon, with defined decay rates (expressed as half-life). Net Harvested Wood Products is the sum of carbon transferred in the year of manufacturing minus the carbon emitted from prior

years' production.

hog fuel: Residual biomass fuel that comes from the processing of wood products. Includes scrap wood, bark, sawdust, or shavings.

Irving Forest Supply Chain (Supply Chain): Includes operations in various Irving entities (wholly or partially), including J.D. Irving, Limited, Irving Pulp & Paper, Limited, Irving Paper Limited, Irving Consumer Products Limited, Irving Consumer Products, Inc., New Brunswick Railway Company, Grand River Pellets Limited, Rothesay Paper Holdings Ltd., St. George Pulp & Paper Limited, St. George Power LP, Charlotte Pulp and Paper Co. Ltd., Miramichi Timber Holdings Limited, Allagash Timberlands LP, Aroostook Timberlands LLC, Maine Woodlands Realty Company, Maritime Innovation Limited, Irving Forest Products, Inc., Irving Air Services Inc., Juniper Organics Limited, and Forest Patrol Ltd.

Kraft pulp: semi-finished Forest Product used to make tissue, paper, and other end-use products.

Leakage: process by which carbon is removed within the boundary but emitted elsewhere outside the boundary by way of a similar activity. Example: Forests remove carbon within the boundary with harvesting not exceeding growth rate, but forests outside the boundary are overharvested to supply mills, leading to more carbon being emitted outside the boundary. Leakage is counterproductive and leads to less total carbon removed globally, than reported within the boundarv.

lignin: approximately 50 per cent of the composition of wood. Wood is made of fibre and lignin holds the fibres together. In the process of making chemical pulps, wood is broken down into fibre and lignin. and lignin is the waste product and can be burned as directly as Biogenic energy or as biologically digested into CH₄.

linerboard: paper that forms the inside and outside of a cardboard box.

log or sawlog: portion of either a conifer or deciduous tree, harvested with the primary purpose of producing lumber.

lumber: solid wood product from either coniferous or deciduous trees used in construction, furniture, flooring, packaging etc.

Net Forest Growth: GHG emissions or removals related to tree growth and mortality, including live above and below

ground biomass, soils, and dead organic matter (DOM) both above and below ground.

Other Crown lands: New Brunswick Crown lands managed by a non-Irving Licensee that supply wood to various other customers (referred to as Sub-Licensees). Irving is a sublicensee of Other Crown lands.

parent rolls: semi-finished tissue product that is converted and packaged into end-use consumer Tissue products (e.g., facial, bath, napkin, paper towel).

Private Lands: small, medium, or large sized private ownership by individuals or companies that may be used to supply forest products, but not financially or otherwise controlled by Irving.

pulp: wood product that results from converting solid wood chips to a wood-based slurry by chemical or mechanical processes. The slurry then forms a sheet that is dried with heat and pressure to make paper. Kraft pulp may be sold semi-finished to other end-users or pulp may be converted directly in the process to make other semifinished paper products.

pulpwood: portion of either a conifer or deciduous tree, harvested with the primary purpose of becoming wood chips for pulp or paper. Typically, the portion of a tree that is too small to be log/sawlog or has defects that prevent the production of lumber.

Residues (Residual): by products from the processing of conifer or deciduous logs or pulpwood by sawmills that include wood chips (chips), sawdust, shavings, or bark. Residues/Residuals are used to supply downstream operations such as pulp and paper manufacturing or are used as biomass energy products.

Tissue: end-use consumer products such as facial, bath, napkin, and paper towel products.

Supply Chain: all of the activities or steps linked to produce and distribute products from raw materials to Customers.

PAS2060 DECLARATION OF CARBON NEUTRAILTY - 2021 QUALIFYING EXPLANATORY STATEMENT



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