

Responsible Procurement Program

Program Document

Responsible Procurement Program

March 25, 2010

Executive Summary

The goal of the Responsible Procurement Program (RPP) is to harness the power of the U.S. wood flooring industry and the broader U.S. hardwood industry to promote environmentally- and socially-responsible forest management in the regions that supply the timber on which we all depend. Participation in the RPP is voluntary and open to all.

The RPP was conceived and is administered by the National Wood Flooring Association (NWFA). RPP partners include Forest Stewardship Council U.S. (FSC-US), Scientific Certification Systems (SCS), The Forest Trust, Rainforest Alliance TREES US Program and the FSC Family Forests Alliance.

The RPP is currently designed for secondary manufacturers of hardwood flooring as well as the primary manufacturers (operations such as sawmills and veneer mills that use hardwood logs as inputs to their production) that supply them with raw materials. The RPP was designed in such a way that it may be extended to other sectors of the hardwood industry such as hardwood plywood, cabinetry, and furniture if there is future interest in the Program in those sectors.

The RPP entails a commitment to continuous progress within the RPP framework, as measured by increases in sales of products approved by the Program. The RPP provides progressive “tiers” that act like rungs on a ladder on which participants can move gradually upward toward ever-higher levels of social and environmental performance.

Tier 1 requires participation in the RPP Chain-of-Custody program. It details Program requirements for domestically-sourced wood and use of the *U.S. Renewing Forests* label in off-product claims only.



It also details requirements for imported wood and use of the *Legal* label, providing evidence of the exercise of “due care” under the amended Lacey Act.



Program participants have no more than three years from the date of issuance of their RPP Chain-of-Custody certificate to progress from Tier 1 to Tier 2.

Tier 2 requires FSC Chain-of-Custody certification and a commitment to building, over time, trade in FSC-certified wood products. Participants at this level are expected to join the FSC Procurement Group whose goal is to assist in developing programs to overcome the barriers to the FSC certification of family forest lands across the hardwood region of the U.S. Participants are also required to meet FSC Controlled Wood standards for all of their non-FSC certified supply within two years of progressing to Tier 2 or 5 years of the date of issuance of their RPP Chain-of-Custody certificate – whichever comes later. Finally, prior to advancing to Tier 2, a Program participant must meet all Program requirements for wood imported from countries that are not considered to be at low risk for illegal logging.

Tier 3 is the highest level of achievement within the RPP. While other two Tiers are mandatory and time-bound, Tier 3 is aspirational and open-ended. It recognizes companies whose trade in FSC-certified products exceeds 50% of overall sales and whose non-FSC sales meet FSC Controlled Wood standards.

Responsible Procurement Program

March 25, 2010

Program Goal

The central goal of the Responsible Procurement Program (RPP) is to harness the power of the U.S. wood flooring industry and the broader U.S. hardwood industry to promote environmentally- and socially-responsible forest management in the regions that supply the timber on which we all depend.

Key Program Elements

The RPP is:

- 1) open to all companies who wish to participate;
- 2) voluntary;
- 3) transparent;
- 4) intended to bring about real change in the wood products trade;
- 5) verified through independent third-party auditing

The RPP was conceived and is administered by the National Wood Flooring Association (NWFA). Scientific Certification Systems (SCS) played a central role in the development of the program from its inception; because of its contributions, SCS is the Preferred Provider for the NWFA RPP. The RPP has also benefited from the input of other RPP partners, including Forest Stewardship Council U.S., the FSC Family Forests Alliance, Rainforest Alliance TREES US Program, and The Forest Trust.

The governing entity of the RPP is its Governing Board. For more information on the Board and its functions, see Appendix 4.

The RPP is currently designed for secondary manufacturers of hardwood flooring as well as the primary manufacturers (operations such as sawmills and veneer mills that use hardwood logs as inputs to their production) that supply them with raw materials. The RPP was designed in such a way that it may be extended to other sectors of the hardwood industry such as hardwood plywood, cabinetry, and furniture if there is future interest in the Program in those sectors.

Participation in the RPP is not to be taken lightly. It entails serious commitments on the part of all companies who choose to participate. However, we believe that the near- and long-term benefits for Program participants and for our industry far outweigh any burdens involved.

Partners

RPP partners include Scientific Certification Systems (SCS), Forest Stewardship Council U.S. (FSC-US), the FSC Family Forests Alliance, TREES US and The Forest Trust.

- ✓ SCS is a leading third-party provider of certification, auditing and testing services, and standards development whose goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors and to stimulate continuous improvement in sustainable development. SCS is an FSC-accredited certifier, and provides numerous other verification services, including legality verification. SCS is the Preferred Provider for the NWFA RPP.
- ✓ FSC-US is the national initiative of the Forest Stewardship Council, an independent, non-governmental, not for profit organization established to promote the responsible management of the world's forests. The RPP recognizes Forest Stewardship Council (FSC) certification as the leading standard for environmentally and socially responsible forestry and forest products.
- ✓ The FSC Family Forests Alliance was created to enlarge the community of non-industrial land owners and small businesses practicing responsible forestry to FSC standards. NWFA aims to coordinate closely with the FSC Family Forests Alliance and FSC-US in developing an FSC Procurement Group whose goal is to make FSC certification more attractive to small, private landowners across the hardwood region. See below for more information on the FSC Procurement Group.
- ✓ Rainforest Alliance TREES (TRaining, Extension, Enterprises & Sourcing) US Program works with small- to medium-sized enterprises (SMEs) and local communities to maximize their investment in

certification and related forest sustainability initiatives, involving individuals and groups along the entire spectrum of forestry-related activities, from landowners, loggers, foresters and wood processors to paper producers, architects and builders. Linking them with governmental agencies, educational institutions, and service providers, TREES works to provide sustainable forestry businesses with the tools they need to succeed, increase awareness of the issues and forge the connections that will ensure the success of their COC certification strategy. TREES is a program of the Rainforest Alliance.

- ✓ The Forest Trust (TFT) is a non-profit organization whose mission is to conserve forests. TFT helps businesses bring to market products that are produced without devastating forests, destroying biodiversity or harming indigenous peoples and local communities. TFT does this by a) providing technical assistance to businesses and forest managers to help them achieve FSC certification and, in some cases, legality verification; b) excluding illegal wood from supply chains; and c) raising industry and consumer awareness about responsible practices.

Program Tiers

The RPP provides progressive “tiers” that act like rungs on a ladder on which participants can move gradually upward toward ever-higher levels of social and environmental performance.

Tier 1

At the entry level of the Program, participants commit to the following:

- 1) The company shall develop and adopt a Responsible Procurement Policy that conforms to Program requirements.
- 2) The company shall participate in the RPP Chain-of-Custody (CoC) program. The initial RPP CoC audit (evaluation audit) shall be conducted by RPP Preferred Provider SCS, except when a) a Program participant has a current, valid FSC Chain of Custody Certificate or Verified Legal Statement with a different auditor and that auditor has been approved by the RPP Governing Board to perform RPP CoC audits, or b) the RPP participant solicits a bid from an approved auditor other than SCS and this bid is lower than that provided by

- SCS. In the latter case, SCS shall have the opportunity to submit a lower bid, and if SCS does not do this, the Program participant shall have the right to contract with the approved auditor of their choosing.
- 3) After the initial (first year) RPP CoC audit, the Program participant shall be free to contract with the approved auditor of its choosing.
 - 4) The goal of the RPP CoC system is to ensure that wood flooring and other wood products can be traced back to Source Types that meet Program requirements. This system is based on company reporting and is backed by third-party auditing.
 - 5) If the participating company manufactures (either domestically or overseas) wood flooring or other hardwood products made from raw materials originating in the U.S. and wishes these products to qualify for the *U.S. Renewing Forests* Source Type and be eligible for the *U.S. Renewing Forests* label, then they shall procure hardwood from U.S. forests located in states in which annual data released by the USDA Forest Service confirm that state-wide hardwood timber growth exceeds total hardwood timber loss or removal through harvest or mortality.¹
 - 6) In addition, to qualify for the *U.S. Renewing Forests* Source Type and be eligible for the *U.S. Renewing Forests* label, wood flooring and other hardwood products made from domestically-sourced timber shall not violate FSC Controlled Wood criteria.² For more information

¹ The RPP will use the 2008 release of USDA FIA statistics for estimated volume of growth, estimated volume of removals and estimated volume of mortality endorsed by a representative of the USDA FIA for companies entering the program in 2009 and 2010. Updates will be made on an annual basis starting with the release of 2009 statistics in or around July 2010. After the 2008 baseline it will take two consecutive years of ‘non-renewing’ (removals and mortality exceed growth) or ‘renewing status’ (growth is equal to or greater than removals and mortality) before the state will be re-classified. Additionally, when a FIA endorsed “margin of error” is available it may be used to demonstrate renewing status.

² FSC Controlled Wood specifies the following five origins must be **avoided**:

- 1) Illegally harvested wood
- 2) Wood harvested in violation of traditional and civil rights
- 3) Wood harvested in forests in which High Conservation Values (areas particularly worth of protection) are threatened through management activities
- 4) Wood harvested from conversion of natural forests
- 5) Wood harvested from areas where genetically modified trees are planted

on FSC Controlled Wood, contact an FSC-accredited certifier or see <http://www.fsc.org/cw.html>

- 7) Companies who satisfy the above requirements are entitled to use the *U.S. Renewing Forests* label in off-product claims only on qualifying products or product lines. For guidelines, see the Labeling and Promotion section below and the RPP Label Communications Use Rules and Restrictions in Appendix 3.
- 8) If a participating company is a manufacturer or importer of wood flooring or other hardwood products made from raw materials originating from countries that are not considered to be at low risk for illegal logging (see Appendix 1), then the company shall engage with an NWFA-approved organization that provides legality verification audits to ensure that the imported wood meets NWFA definitions for “Verified Legal Origin” (see Appendix 1). Note that in obtaining independent verification of legal origin, companies will provide evidence of the exercise of “due care” under the amended Lacey Act (for more information, see <http://www.eia-global.org/lacey>).
- 9) Products manufactured from timber:
 - a. that is verified by SCS or other approved auditor as having been sourced from a country determined to be at low risk for illegal logging, or
 - b. that is from a country considered to be at significant risk for illegal logging but that
 - i. comes from a source that has been certified to FSC’s Controlled Wood Standard, OR
 - ii. originates from forest that is certified by a national forest certification system endorsed by the Programme for the Endorsement of Forest Certification (PEFC) – note that 100% of the contents of a wood product must come from a PEFC-certified forest to satisfy this requirement, OR
 - iii. originates from a forest that has undergone a successful audit of Verified Legal Origin by an NWFA-approved organization

shall be classified in the *Legal Source Type* and are entitled to use the *Legal* label in off-product claims only. For guidelines, see the

Labeling and Promotion section below and the RPP Label Communications Use Rules and Restrictions in Appendix 3.

- 10) Products that meet Program definitions for pre-consumer recycled, post-consumer recycled or salvaged shall be classified in the *Other Acceptable* Source Type. The RPP does not provide a separate label for these products, but these products may be eligible for labels offered by SCS and other partner organizations.
- 10) Before it can advance to Tier 2, a Program participant must warrant that ALL products made from raw materials originating in countries where the risk of illegal logging is significant have been certified as Verified Legal Origin by an NWFA-approved organization; alternatively, the participant can cease trading in such products.
- 11) Before it can advance to Tier 2, a Program participant must assess all of its wood supply against FSC Controlled Wood standards and provide a report to NWFA documenting where they stand for benchmarking purposes. For more information on FSC Controlled Wood, contact an FSC-accredited certifier or see <http://www.fsc.org/cw.html>

Tier 2

Tier 2 represents the next level of commitment and achievement in the RPP. Program participants are required to advance to Tier 2 as rapidly as possible, but must do so within three years of the date of issuance of their RPP Chain-of-Custody (CoC) certificate.

At Tier 2, Program participants commit to the following:

- 1) The company will obtain FSC Chain-of-Custody (CoC) certification, which in turn requires an annual on-site audit conducted by an FSC-accredited Certification Body (see Appendix 2). RPP CoC certification does not have to be maintained separately once FSC CoC certification is in place, provided that the FSC-accredited certifier expands the scope of the certification audits to include all applicable RPP Tier 1 requirements.

- 2) By sourcing from FSC-certified forests, the company must actively manufacture and/or trade FSC-certified products and must establish concrete targets to increase its sales of FSC-certified products over time. See the section below on Benchmarking and Accountability.
- 3) The company must join the FSC Procurement Group (see the end of the body of this document).
- 4) Within two years of the time the company enters Tier 2 or five years of the date of issuance of their RPP Chain-of-Custody (CoC) certificate), whichever comes later, the company shall meet FSC Controlled Wood standards for all of their non FSC-certified wood supply if they wish to maintain their good standing within the Program. For more information on FSC Controlled Wood, contact an FSC-accredited certifier or see <http://www.fsc.org/cw.html>

Tier 3

The highest level of achievement in the RPP is Tier 3. This level is intended to recognize outstanding leadership in realizing the goals of the RPP and is reserved for Program Participants who meet all Tier 1 and Tier 2 requirements, and who achieve 50% or more of their sales as FSC certified. Non-FSC products must meet FSC Controlled Wood standards. Program participants are encouraged to achieve Tier 3 as quickly as possible, but given how high the bar is set, the time frame for doing so is flexible.

Labeling and Promotion

The RPP introduces two new labels into the marketplace:

- 1) *U.S. Renewing Forests*
- 2) *Legal*



NWFA members are encouraged to use versions of the labels that include the NWFA acronym as follows:



Use of the RPP labels is only allowed in off-product claims – that is, the label cannot be applied to wood flooring and other finished products themselves, but can only be used in promotional and marketing materials such as websites, brochures, and merchandising.

At the option of the Program participant, boxes or bundles of wood flooring and other finished products can bear a code that will be issued by NWFA after the company has successfully passed an RPP CoC audit.

It is important that RPP participants understand the defined and limited scope of the claims associated with these labels (and the underlying Tier 1 and Tier 2 requirements that stand behind them).

The *U.S. Renewing Forests* label means that raw materials originate from U.S. forest regions 1) where hardwood growth exceeds removal at the statewide level, and 2) that are considered at low risk of illegal logging, conversion to non-forest uses, threats to high conservation values, etc. This

is, by its nature, a generalized claim based on the aggregation of large amounts of data and is NOT intended to imply that the forests of origin are “responsibly,” “sustainably,” and/or “well” managed at the level of the individual management unit.

The *Legal* label means that raw materials originate either from U.S. forests that do not qualify for the *U.S. Renewing Forests* label OR they originate from non-U.S. regions/countries that a) are low-risk for illegal logging, or b) meet Program definitions of Verified Legal Origin as verified by an NWFA-approved organization (see Appendix 1). Again, this is not intended to imply that the forests of origin are “responsibly,” “sustainably,” and/or “well” managed at the level of the individual management unit.

Finally, it is very important to note that the RPP is structured in such a way that both RPP labels are transitional and are intended to give way, in due course, to FSC certification. The transitional nature of the RPP US Renewing Forests and Legal labels is made clear on the labels themselves.

*Use of both RPP labels in off-product claims is reserved for Program Participants. All promotional claims related to RPP labeled products and Program participation – whether on product literature, brochures, samples, or displays - must be approved in advance by NWFA. **Please refer to the RPP Label Communications Use Rules and Restrictions in Appendix 3 for more information.***

The final label relevant to the RPP is that of the FSC. FSC has strict requirements that guide the use of the FSC logo, on- and off-products, as well as guidelines for promotional claims. Only companies that have obtained FSC CoC certification (a Tier 2 requirement) can use the FSC label and make FSC promotional claims. For more information, contact an FSC-accredited certifier (Appendix 2).

Engineered Wood Flooring and Mixed Sources

The following are Program requirements for engineered wood flooring or other products that may combine materials from different sources:

- 1) In order to qualify for the *U.S. Renewing Forests* label, all of the wood used in the product must be domestically-sourced and meet Tier 1 requirements for products that are marketed under this label.

- 2) In order to qualify for the *Legal* label, all of the wood used in the product that originates in countries not considered to be low risk for illegal logging (see Appendix 1) must meet NWFA Verified Legal Origin requirements.
- 3) Where a product contains a mix of wood from both of the above sources, then the entire product shall be designated Legal and is eligible for the *Legal* label, provided that it meets all requirements for use of that label.
- 4) Per Tier 2 above, within 5 years of the initial date of issuance of an RPP Chain-of-Custody (CoC) certificate, all non-FSC-certified wood used in products must meet FSC Controlled Wood requirements.

Accuracy of RPP Source Types and Labels

RPP participants must classify their products accurately according to Source Type and, if they opt to use a label, use the label that corresponds to that Source Type. That is, if a product meets Program requirements for U.S. Renewing Forests, it shall be classified to the *U.S. Renewing Forests* Source Type and, if labeled, shall use the *U.S. Renewing Forests* label. This product shall not be classified to the *Legal* Source Type or be eligible for the *Legal* label.

Benchmarking and Accountability

All participants in the RPP will start out by evaluating their suppliers and the origins of wood supplied. Based on this evaluation, the Program participant shall broadly classify its products into one or more of the following Source Types:

- 1) Unknown/Unacceptable
- 2) FSC Certified
- 3) U.S. Renewing Forests
- 4) Legal
- 5) Other Acceptable

Further information on these Source Types and the benchmarking process can be found in the RPP Guidance Documents and the RPP Standard.

This initial evaluation and classification will constitute a baseline for measuring progress toward fulfillment of Program goals. After the baseline is established, participants will establish objectives for future sales (by percentage of overall sales rather than in absolute terms) for products in each Source Type. These benchmarks will be established through the cooperation and to the mutual satisfaction the RPP auditor and each individual Program Participant. NWFA will also work with FSC-US to ensure that benchmarking is ambitious yet achievable, as accountability is central to the credibility of the Program.

The overarching goal of the benchmarking and accountability process is to increase the supply of hardwood and other products that meet program requirements and, eventually, the requirements of FSC certification.

The baselines and benchmarks of individual Program participants will be aggregated to form the overall baseline and benchmarks by which NWFA and its partners will measure and judge the progress and success of our Responsible Procurement Program.

Continuous Progress

Program participants commit to continuous progress, both of sales of approved products and within the tiered framework of the Program. It is expected that Program participants will progress from Tier 1 to Tier 2 within three years of the date of issuance of their RPP Chain-of-Custody (CoC) certificate, although they are encouraged to do so sooner. Progress from Tier 2 to Tier 3 is also encouraged in the shortest possible time frame, but the requirement is open-ended given the nature of Tier 3 requirements.

If, subsequent to its initial RPP CoC audit, a Program participant has satisfied (or clearly has the ability to satisfy) all of the requirements to progress from one Tier to the next, then the Company shall advance to the next Tier no later than by the time of its next RPP CoC audit.

Failure to progress from one Tier to the next without reasons that NWFA deems valid and persuasive may be grounds for removal from the Program. Similarly, a failure to progress toward established benchmarks for increased

sales of products (as a percentage of overall sales, not in absolute terms) that comply with Program requirements is also contrary to the goals and spirit of the RPP, and could result in probation or removal.

Naturally, companies that are making good faith efforts to progress from one Tier to the next and/or to meet benchmarks for increasing sales of qualifying products, but are unable to do so for reasons beyond their control, will be granted extensions or exemptions, depending on circumstances and the judgment of NWFA.

Controlled Wood

In advancing the RPP, NWFA and its partners in the hardwood industry will work with FSC-US and other relevant parties on an ongoing basis to build upon work that has been done to date to understand and document how wood from the 33 U.S. hardwood-producing states conforms to FSC Controlled Wood criteria.

FSC Procurement Group

The FSC Procurement Group will play a central role in the long-term success of the RPP. The goal of the Procurement Group is to assist in developing programs to overcome the barriers to the FSC certification of family forest lands across the hardwood region of the U.S., as family forest lands are a major source of raw material supply for our industry. The FSC Procurement Group is constituted of representatives of RPP participants and other organizations that support its mission

The guiding and planning entity for the FSC Procurement Group is its Steering Committee. For more information on the Committee, see Appendix 4.

Appendix 1: Legality Verification and the Lacey Act

Tier 1 of the RPP requires that companies engage with an NWFA-approved legality verifier to seek verification of legal origin for timber from countries that are not considered to be at low risk for illegal logging.

NWFA has established minimum requirements for assessing and approving credible legality verifiers (see end of appendix). NWFA has also established an advisory committee to review applications by legality verifiers that wish to perform verification of legal origin audits under the RPP. A list of approved legality verifiers will be posted to www.rpprogram.org

The RPP Program requirements with respect to use of the *Legal* label intends to provide a clear and effective way to provide evidence of the exercise of “due care” under the amended Lacey Act.

Amendments to the Lacey Act passed in congress in May 2008 have put a series of requirements on timber traders and wood products manufacturers. The Lacey Act bans any commerce in illegally sourced plants and their products –including timber and wood products. The Lacey Act:

- prohibits all trade in plant and plant products (e.g., furniture, paper, or lumber) that are illegally sourced from any U.S. state or any foreign country.
- requires importers to declare the origin of harvest and species name of all plants contained in their products.
- establishes penalties for violation of the Act, including forfeiture of goods and vessels, fines and jail time.

The Lacey Act requires importers to provide a basic declaration to accompany every shipment of plants or plant products. The purpose of these declarations is to increase transparency about the timber and plant trade and enable the U.S. government to better enforce the law. The declaration must contain:

1. the scientific name of any species used,
2. the country of harvest,
3. the quantity and measure, and
4. the value.

The amended Lacey Act encourages any party that trades in wood products to exercise “due care” in terms of ensuring that wood or wood products traded are not from an illegal source. “Due care” is a flexible concept developed over time by the U.S. legal system and is defined as “that degree of care which a reasonably prudent person would exercise under the same or similar circumstances. Compliance with RPP Program requirements with respect to use of the *Legal* label is intended to provide evidence of the exercise of “due care” under Lacey. *This said, neither the RPP nor any other certification or auditing process provides a guarantee of legality or a “get out of jail free” card with respect to Lacey enforcement.*

Countries that are not considered low risk for illegal logging will naturally require a higher level of diligence in assuring legality. *As of the date on this document, the Global Risk Assessment (GRA) is the key resource for determining risk in regards to illegal logging for the RPP. Please ensure that you have the most recent version of the RPP Program document by visiting <http://www.rpprogram.org>*

The GRA it is being developed by NEPCoN in cooperation with the Rainforest Alliance and the Forest Stewardship Council. The tool is available online and provides information about the risk of sourcing controversial wood from more than 150 countries.

Please visit: <http://gra.nepcon.net/> and select the “Legality” radio button for more information.

Tier 2 requires that wood products from a country not considered low risk for illegal logging meet one of the following three requirements:

- 1) The wood product shall come from a source that has been certified to FSC’s Controlled Wood Standard, OR
- 2) The wood shall originate from forests that have been certified by a national forest certification system endorsed by the Programme for the Endorsement of Forest Certification (PEFC) – note that 100% of the contents of a wood product must come from a PEFC-certified forest to satisfy this requirement, OR

- 3) The wood shall originate from forests that have undergone a successful audit of Verified Legal Origin³ by an NWFA-approved organization.

The following minimum requirements shall be met by an organization to be considered by NWFA as having a credible and acceptable legality verification program:

1. Legality Verification Standards must conform to the following:
 - a) Standards shall be developed through a stakeholder consultation process equivalent to the ISEAL Code of Good Practice for Setting Social and Environmental Standards⁴.
 - b) Standards, including for timber harvest/forest management and chain of custody, shall be publically available
 - c) Standards shall include adherence to national and international harvest, trade, tax, tenure, ownership, and endangered species laws and treaties
 - d) Standards shall require annual on-site audits of the verified entities/supply chains
 - e) Standards shall have a chain of custody component
2. Legality Verification Organizations must conform to the following:
 - a) Be accredited to ISO Guide 65, general requirements for a third-party operating a product certification system⁵. Such accreditation shall include legal verification, forest management certification or chain of custody certification in the scope.
 - b) Auditors/Assessors shall be qualified and trained
 - c) Publically available list of certified and/or verified entities, their geographic location, and the scope of the verification (i.e. products and species).
 - d) If the verification organization is utilizing a standard owned or developed by a different organization the verifier shall hold a valid accreditation by the appropriate body.

³ . The accepted definition of Verified Legal Origin is as follows:

Verified Legal Origin (VLO) -- also referred to as Legal Right to Harvest, VLO means that the Forest Manager has authorization from the forest owners to harvest in the forest management unit under a valid permit, license, or similar instrument issued pursuant to the laws and regulations governing the harvesting of forest resources.

⁴ ISEAL – www.isealalliance.org/

⁵ ISO – www.iso.org/

Appendix 2: FSC-Accredited Certifiers

For a complete list of FSC-accredited certifiers to whom Program participants can turn to fulfill Tier 2 requirements, see this [List of FSC-Accredited Certifiers](#)

The FSC-accredited certifiers presently active in the U.S. are:

SCS
2200 Powell St., Ste. 725
Emeryville, CA 94608
Ph: 510-452-8000
<http://www.scscertified.com/>

SmartWood
65 Millet Street, Suite 201
Richmond, Vermont 05477
Ph: 802-434-5491
<http://www.rainforest-alliance.org/forestry.cfm?id=certification>

SGS North America
201 Route 17 North
Rutherford, NJ 07070
Ph: 201-508-3000
http://www.us.sgs.com/forestry_certification_us

Bureau Veritas
515 West Fifth St.
Jamestown, NY 14701
Ph: 800-937-9311
<http://www.us.bureauveritas.com>

American Green Business (In Affiliation with GFA Certification)
126 Oak Hill Rd
Shelburne, VT 05482
Ph: 802-659-4490
<http://www.americangreen.net>

Appendix 3: Label Communications Use Rules and Restrictions

The credibility and value of the RPP hinges on avoiding inaccurate, misleading, or exaggerated claims related to the Program, its partners, and the products it covers.

Use of all RPP labels in off-product claims is reserved for Program Participants. All promotional claims related to RPP labeled products and Program participation – whether on product literature, brochures, samples, or displays - must be approved in advance by the NWFA-approved RPP auditor. PRE-APPROVED STANDARDIZED USES ARE PROVIDED HERE

All RPP participants **MUST STRICTLY** adhere to the communication guidelines and label usage requirements contained in this document.

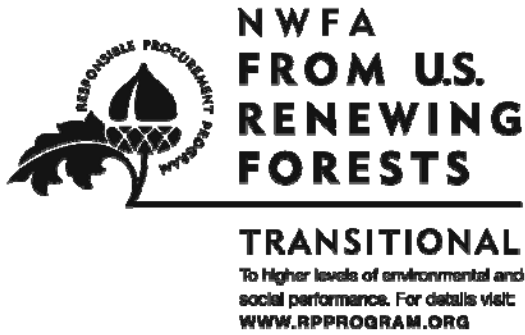
General Guidelines

The RPP introduces two new labels into the marketplace *for off-product claims only*:

- 1) *U.S. Renewing Forests*
- 2) *Legal*



NWFA members are encouraged to use versions of the labels that include the NWFA acronym as follows:



Both RPP labels can only be used in off-product claims. The labels are intended for use on:

- Marketing and promotional materials such as product brochures and literature
- Advertising in trade and consumer publications
- Product samples and other merchandising
- Company websites for products that are eligible for the labels

The labels cannot be applied directly to finished hardwood products, including boxes or bundles of wood flooring (Boxes or bundles can bear a code that will be issued by NWFA after the company has successfully passed an RPP Chain of Custody audit).

Suggested language for describing the RPP and your company's participation in the program is as follows:

“The goal of the RPP and (*company name*) is to promote environmentally and socially responsible forest management in the regions that supply the hardwood timber on which we all depend.”

“In participating in the RPP, our company commits to making continuous progress toward ever-higher levels of environmental and social performance in our hardwood procurement.”

FSC Truth Statement

As a partner of the RPP, the Forest Stewardship Council (FSC) has authorized RPP participants to use the following FSC Truth Statement in off-product marketing:

“FSC-US recognizes and supports the Responsible Procurement Program as

a valid incremental approach toward socially and environmentally responsible forestry”.

The RPP US Renewing Forests and Legal labels **DO NOT** certify or imply that the forests of origin are “green,” “responsibly managed,” “sustainably managed,” and/or “well managed.”

- **Do not use claims that state or imply the company or product is “green.”**
- **Avoid claiming that products or harvesting practices are “sustainable.”**
- **Avoid using terms such as sustainable, sustainably, responsibly or well managed.**

Using the U.S. Renewing Forests Label

The *U.S. Renewing Forests* label is designed for products whose raw materials originate from U.S. forest regions:

- 1) Where timber growth exceeds loss at the statewide level, and
- 2) That are considered at low risk of illegal logging, conversion to non-forest uses, threats to high conservation values, etc.

This does not mean that these forests are being managed responsibly or in a sustainable manner. Therefore, use of language that states or implies “responsible,” “sustainable” or “green” in any way in relation to the *U.S. Renewing Forests* label is prohibited.

Suggested language for describing the *U. S. Renewing Forests* label is as follows:

“The *U.S. Renewing Forests* label identifies wood that is sourced from US states where hardwood timber growth exceeds loss through harvest and mortality. It is transitional to higher levels of environmental and social performance.”

“Wood flooring that is marketed under *US Renewing Forests label* is made from wood sourced from U.S. states where hardwood timber growth exceeds loss through harvest and mortality. It is transitional to higher levels of

environmental and social performance.”

Using the Legal Label

The *Legal* label is designed for products whose raw materials originate either from U.S. forests that do not qualify for the *U.S. Renewing Forests* label OR they originate from non-U.S. regions/countries that are considered low risk for illegal logging OR that meet Program definitions of Verified Legal Origin as verified by an NWFPA-approved organization (see Appendix 1).

This does not mean that the forests from which the wood was procured are being managed responsibly or in a sustainable manner. Therefore, use of language that states or implies “responsible,” “sustainable” or “green” in any way in relation to the *Legal* label is prohibited.

Suggested language for describing the *Legal* label is as follows:

“The *Legal* label identifies wood products that meet national and international standards for legal timber harvest. It is transitional to higher levels of environmental and social performance.”

“Wood flooring that is marketed under the *Legal* label meets national and international standards for legal timber harvest. It is transitional to higher levels of environmental and social performance.”

Using the FSC Logo and FSC Promotional Claims

The final label relevant to the RPP is that of the FSC. FSC has strict requirements that guide the use of the FSC logo, on- and off-products, as well as guidelines for promotional claims.

Only companies that possess a valid FSC CoC certification (a Tier 2 requirement) can use the FSC label and make FSC promotional claims. For more information, contact FSC or another FSC-accredited certifier.

It is very important to note that the RPP is structured in such a way that both RPP labels are intended to give way, in due course, to FSC certification. The transitional nature of the RPP labels is clearly stated on the labels themselves.

Appendix 4: RPP Governing Board and FSC Procurement Group Steering Committee

The RPP Governing Board is the governing entity of the RPP. Its functions include the following:

- Approving any major changes to the RPP program design
- Approving and assisting in expansions of the RPP to other sectors of the hardwood industry
- Finalizing the standards for legality verification
- Reviewing legality verifiers against these standards to develop a list of NWFA-Approved Legality Verifiers
- Review of RPP manufacturer participants' compliance/performance
- SCS oversight and performance review

As of the date on this document, its members are as follows:

Don Finkell, Anderson Hardwood Floors, Chairman
Corey Brinkema, FSC- US
Robert Hrubes, Scientific Certification Systems, Inc.
Ed Korczak, NWFA
Neil Poland, Mullican Flooring
Jason Grant, NWFA Advisor

The FSC Procurement Group Steering Committee is the guiding entity for the Group. Its functions include planning the activities of the Group and, in some cases, executing those activities. As of the date on this document, its members are as follows:

Neil Poland, Mullican Flooring, Chairman
Don Finkell, Anderson Hardwood Floors
Lewis Fix, Domtar
Jason Grant, NWFA Advisor
Ian Hanna, FSC Family Forest Alliance
Robert Hrubes & Dave Wager, Scientific Certification Systems, Inc.
Ed Korczak, NWFA
Linda Kramme, World Wildlife Fund US
Paul Pingrey, Pingrey Forestry LLC
Fran Price, The Nature Conservancy

Eric Smith, Kapstone Paper
Karen Steer, The Forest Trust/FSC US
Lisa Stocker, Rainforest Alliance TREES US Program
Kenneth Strassner, Strassner Consulting

RPP Implementation Timeline

