# Responsible Procurement Program (RPP) Standard RPP-STN-V1 (April 12, 2010)

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#### A Scope

This Standard stipulates practices for responsible procurement of wood for the purposes of demonstrating conformance to the Responsible Procurement Program (RPP).

This document specifies the provisions for the definition and implementation of an organization's quality management, source verification, and chain of custody program aimed at ensuring that products offered under (i.e., identified with) this program are coming from the following RPP acceptable sources types:

- 1) FSC-Certified
- 2) From a U.S. Renewing Forest
  - a) The forest of origin is located in a U.S. State where the volume of hardwood growth meets or exceeds mortality and removals, AND
  - b) The forest of origin is located in a U.S. State or sub region considered 'low risk' for violations of traditional or civil rights; management activities that threaten high conservation values; contain plantations of genetically modified trees; illegal logging or conversion from natural forest to plantations or non-forest uses.
- 3) Legal
  - a) Countries deemed to be low risk in terms of illegal logging, OR
  - b) legal harvest has been determined through credible independent verification
- 4) Pre and Postconsumer Recycled Wood

#### B Effective Date of Standard

Effective from the date of release: Applicant organizations seeking acceptance into the RPP must be independently confirmed to comply with this Standard prior to making any membership claims or use of the RPP membership labels or seals.

#### C References

Responsible Procurement Program (RPP) Program Document April 12, 2010; FSC Chain of Custody Standard (FSC-STD-40-004 V2-0); FSC Controlled Wood Standard (FSC-STD-40-005 V2-1)

#### D Terms and Definitions

Annex 1 provides a glossary of the terms and definitions used throughout this Standard which have been kept consistent with credible chain of custody and legal verification standards.

### E Important Notes on the Use of this Standard

This Responsible Procurement Program Standard works in concert with the Responsible Procurement Program Document, Legal Verification Standards and FSC Chain of Custody Standards, referenced in Section C above. In many cases, requirements overlap and this Standard can be fulfilled wholly or partially by complying with compatible chain of custody and legality requirements. Compliance with this Standard alone is not sufficient to allow a company to make FSC or non-RPP legality claims; to be able to do so requires being duly certified/verified to those standards.

#### 1. Quality System

- 1.1. Company Procurement Policy
  - 1.1.1. The Company shall have a written, publically available procurement policy, endorsed by top management, to eliminate *unknown/unacceptable sources* and to show preference for *acceptable sources*<sup>1</sup> which include:
    - 1. FSC Certified
    - 2. U.S. Renewing Forests
    - 3. Legal
    - 4. Other Acceptable
      - a. Post-consumer recycled/reclaimed wood
      - b. Pre-consumer/post-industrial recycled wood
      - c. Salvaged wood
- 1.2. Complaints Mechanism
  - 1.2.1. The Company shall have a publicly-posted mechanism for processing stakeholder complaints and disputes about the designation of sources procured or products sold by the Company with the goal of eliminating the use of wood from sources other than those claimed under Section 1.1 above. Minimum elements of such a mechanism are the following:
    - 1. Evaluate and respond to complaints within 2 weeks.
    - 2. Investigate all complaints within 2 months.
    - 3. If a complaint reveals the use of wood not in line with the Company's procurement policy, the Company shall immediately halt the purchase of that wood.
    - 4. Maintain records for all complaints and actions taken.

<sup>&</sup>lt;sup>1</sup> See RPP Glossary of terms and Section 2.2.2 for more information on the RPP definitions of these source types. RPP-STN-V1\_041210.doc

- 1.3. Documented Procedures & Work Instructions
  - 1.3.1. The Company shall document procedures and work instructions to demonstrate compliance with all parts of this Standard. These procedures shall be kept up-to-date.<sup>2</sup>
  - 1.3.2. The Company shall appoint one individual as an RPP Administrator to have responsibility over the entire wood procurement and chain of custody system.
  - 1.3.3. The Company shall clearly list responsible persons or positions for each task or set of tasks discussed in the procedures.
- 1.4. Training
  - 1.4.1. The Company shall provide training to all relevant staff per a documented procedure and per a written schedule to ensure compliance with the Standard.
- 1.5. Record Keeping
  - 1.5.1. The Company shall maintain records for at least 5 years to demonstrate compliance with all sections of this Standard.
- 1.6. Internal Audits and Management Review
  - 1.6.1. The Company shall conduct internal audits and management reviews at least annually and prior to the initial audit to ensure a well functioning procurement and chain of custody system.
- 1.7. Participating Facilities
  - 1.7.1. The Company shall develop a comprehensive list of facilities (manufacturing, warehousing, headquarters, etc.) that will participate in the RPP, including the addresses and telephone numbers for each.

<sup>&</sup>lt;sup>2</sup> Procedures and work instructions to meet this Standard can be integrated with a Company's ISO or FSC procedures if applicable. RPP-STN-V1\_041210.doc

#### 2. Material Sourcing & Verification

- 2.1. Supplier Notification
  - 2.1.1. The Company shall formally notify its suppliers of the Company's Procurement Policy.
  - 2.1.2. The Company shall obtain completed and signed RPP Supplier Declaration Forms<sup>3</sup> annually<sup>4</sup> from all suppliers of wood.
- 2.2. Classification of Wood Products
  - 2.2.1. Based on the following evidence and documentation from all suppliers of wood products, the Company shall classify its supplies of wood into one of the following *Source Types*:
    - 1. *FSC Certified* wood per the Company's approved FSC CoC procedures and FSC-compliant invoices and shipping documents from suppliers.
    - 2. *RPP US Renewing Forests* wood shall be from Districts (States) within the United States of America where the volume of hardwood growth is equal to or greater than that of mortality and removals<sup>5</sup> and that these same districts are considered low risk for FSC's *Controversial Sources*.<sup>6</sup> Source documentation requirements must meet one of the following:
      - a. Be supplied by a current and valid RPP Certified supplier with RPP US Renewing Forests wood identified on invoices and shipping documents per Section 5 of this standard, OR
      - b. Shall be certified under the Company's *FSC Controlled Wood* system AND include documented evidence of the origin, OR

<sup>&</sup>lt;sup>3</sup> A sample RPP Supplier Declaration Form is attached in Annex 2

<sup>&</sup>lt;sup>4</sup> Declarations must be completed prior to the initial evaluation audit and for any new suppliers obtained .

<sup>&</sup>lt;sup>5</sup> The NWFA will publish the list of renewing forests that qualify. 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. <sup>6</sup> These are the same controversial sources to be avoided under the FSC Controlled Wood Standard (FSC-STD-40-005 v2-1). Compliance to the RPP does not require full FSC Controlled Wood Certification in Tier 10f the program, however, risk shall be assessed through the use of the FSC Risk Map at: <a href="http://globalforestrisk.nepcon.net/">http://globalforestrisk.nepcon.net/</a> and/or the 2008 *Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports* Report for the American Hardwood Export Council.

- c. Be covered under an annual RPP Supplier Declaration Form<sup>7</sup> from a direct *primary supplier* and documented in the Company's supplier accounting system.
- 3. *RPP Legal* shall meet one or more of the following applicable requirements:
  - a. Be linked to a corresponding USDA APHIS Plant and Plant Product Declaration Form<sup>8</sup> covering the shipment of any wood imported into the United States of America.
  - b. Be covered under the Company's valid FSC Controlled Wood program.
  - c. Be covered under a Legal Verification Statement provided by an *NWFA-approved Legality Verifier* when the wood is not from a low risk country and not FSC-controlled.
  - d. Be covered under an annual RPP Supplier Declaration Form if the wood is from the United States of America.
- 4. *Other Acceptable Sources* (e.g. Post-consumer recycled/reclaimed wood, Preconsumer/post-industrial recycled wood or salvaged wood) shall provide documentation demonstrating that the wood meets the definitions per Appendix 1 of this Standard.
- 5. *Unknown/Unacceptable* wood are those products whose origin is unknown and/or the product does not have sufficient documentation to be otherwise classified as one of the acceptable sources in 2.2.1-4 above.

### 3. Product List & Claim Accounting Systems

#### 3.1. Product List

- 3.1.1. The Company shall establish and maintain a list of products available for sale and according to the following hierarchical acceptable source types:
  - 1. FSC Certified<sup>9</sup>
  - 2. RPP U.S. Renewing Forests<sup>10</sup>

<sup>&</sup>lt;sup>7</sup> A sample RPP Supplier Declaration Form is attached in Annex 2

<sup>&</sup>lt;sup>8</sup> APHIS Plant and Plant Product Declaration Form PPQ 505 available at:

http://www.aphis.usda.gov/plant\_health/lacey\_act/downloads/declarationform.pdf

<sup>&</sup>lt;sup>9</sup> All FSC related claims (FSC Pure, FSC Mixed and FSC Recycled) for products that meet the FSC Chain of Custody standards for labeling are included in this category and are governed by FSC rules.

<sup>&</sup>lt;sup>10</sup> RPP Renewing Forests may include FSC Controlled Wood from forests of origin within the United States of America.

- 3. RPP Legal<sup>11</sup>
- 3.1.2. Engineered Wood & Mixed Sources
  - 1. Engineered wood products that combine input materials from multiple sources shall be subject to the following restrictions:
    - a. To be classified as *RPP US Renewing Forests*, ALL wood components used in the engineered/mixed wood product shall meet the criteria and documentation requirements for *RPP US Renewing Forests* as listed above.
    - b. To be classified as *RPP Legal*, ALL wood used in the engineered/mixed wood product shall meet the criteria and documentation requirements For *RPP Legal*, *RPP US Renewing Forests* and/or *FSC Certified* as listed above.
    - c. If any wood component in a product is from an *unknown/unacceptable* source the product may not carry a *RPP Claim* or include the Company's RPP Chain of Custody number in association with the product (e.g. invoices and shipping document line items, brochures, webpages, etc.).
- 3.1.3 The Company shall provide conversion factors for all wood products offered for sale demonstrating the ratio of all wood inputs to final product output.

#### 3.2. Supplier Purchases

- 3.2.1. The Company shall establish and maintain (at least quarterly and prior to annual audits) an accounting system for recording and tracking all wood purchased per supplier and include the following minimum information for each purchase:
  - 1. Product description
  - 2. Species
  - 3. Known origin
    - a. State, County or Landowner from where the wood was harvested within the United States of America, OR
    - b. Country, or region within a country, if the wood was harvested outside the United States of America

<sup>&</sup>lt;sup>11</sup> RPP Legal may include FSC Controlled Wood from forests of origin outside the United States of America. RPP-STN-V1\_041210.doc

- 4. Volume of wood purchased
- 5. Date of purchase and any other Information specific to the shipment (e.g. purchase order number, supplier invoice number, shipping docket number or equivalent.
- 5. RPP Source Type
- 3.2.2. The Company shall maintain accurate records on purchased wood inputs in inventory according to RPP Source Type
- 3.3. Sales and Inventory of Products
  - 3.3.1 The Company shall establish and maintain an up-to-date accounting system for recording and tracking all wood products manufactured and/or sold. The system shall identify products that are currently stored in inventory<sup>12</sup> AND products that have been sold. Minimum information shall include:
    - 1. Product description
    - 2. Volume of wood
    - 3. *RPP Source Type*
    - 4. Date of sale, if applicable
  - 3.3.2 Annual summaries of the volumes of wood purchased and sold per source type shall be provided on request by the Certification Body and prior to annual audits.

### 4. Material Receiving, Storing & Processing

4.1. The Company shall clearly identify and keep all wood received from unknown/unacceptable sources separate from wood from acceptable source types.

<sup>&</sup>lt;sup>12</sup> Inventories at the time of the initial evaluation shall be classified by source type and shall be based on a sound justification. "RPP US Renewing" or "RPP Legal" from the United States or "RPP Legal" from Canada can be granted based on evidence that demonstrates the true origin of the material. Evidence can include species range, transportation costs and current declarations provided for like material from the same suppliers. Inventories that include components imported from other countries must obtain an APHIS import declaration from a low risk country to be considered "Legal". Any inventory material without a corresponding declaration shall be classified as "unknown" inventory. RPP-STN-V1\_041210.doc

- 4.2. If there is any doubt as to the species or the origin of wood received, the Company shall employ the *precautionary approach* and classify the wood as a *unknown/unacceptable* source type.<sup>13</sup>
- 4.3. The Company shall employ a tracking system for keeping *unknown/unacceptable* wood separate from wood from *acceptable* sources types throughout all production stages; no wood from *unknown/unacceptable* sources shall be used in products that qualify for RPP claims.
- 4.4. The Company shall remove any visible segregation marks on products or packaging that mimics the RPP Labels or claims other than accepted chain of custody codes prior to packaging, shipping or sale.

### 5. Sales & Invoicing

- 5.1. Invoices for wood products from RPP *acceptable* source types, as identified by this Standard and the RPP Program Document, shall carry the following information clearly linked to the line item of each product or product component:
  - 5.1.1. The appropriate chain of custody code provided by an NWFA-approved certification body (e.g. SCS-RPP-XXXX), AND
  - 5.1.2 The appropriate claim associated with the product.
    - 1. "RPP Renewing" or
    - 2. "RPP Legal"
- 5.2. If the invoice does not go with the shipment, the shipping document shall contain the requirements under 5.1.1 and 5.1.2 above.
- 6. Promotional Use of RPP Claims and Labels
  - 6.1. The Company shall demonstrate that any use of the *RPP U.S. Renewing Forest* and/or *RPP Legal* labels or claims in off-product promotional material specifically relate to products that meet the requirements and definitions of this standard.<sup>14</sup> Use RPP labels on products and packaging is not permitted.

<sup>&</sup>lt;sup>13</sup> Resources such as the Friends of the Earth good wood guide: http://www.foe.co.uk/campaigns/biodiversity/resource/good\_wood\_guide/wood\_timber\_types\_a\_to\_g.html#a and

the Greenpeace Good Wood Guide at: <u>http://www.greenpeace.org/australia/take-action/live-</u> <u>greener/shopping/goodwood-guide</u> are useful in determining the risk associated with specific species and where such species are grown. Resources like these shall be used at least annually as part of the internal audit and management review to assess risk and the validity of declarations from suppliers.

<sup>&</sup>lt;sup>14</sup> Rules for using the RPP Labels are contained in Appendix 3 of the RPP Program Document. RPP-STN-V1\_041210.doc

- 6.2. The Company shall comply with the RPP Label Communication Use Rules and Restrictions found in Appendix 3 of the RPP Program Document.
- 6.3. Any use<sup>15</sup> of the RPP labels or claims for promotional purposes shall be approved in writing prior to printing or posting.

 $<sup>^{15}</sup>$  Approval by NWFA, SCS, or the relevant NWFA approved Certification Body. RPP-STN-V1\_041210.doc

## 7. Benchmarking, Objectives & Compliance with RPP Tiers

#### 7.1. Benchmarking

- 7.1.1. An initial *baseline* shall be determined for sales of wood products based on each *source type* prior to the Company's initial RPP CoC audit and shall be recalculated every 12 months thereafter.
- 7.1.2. Baselines for each *source type* shall be calculated as a percentage of total wood sales by volume.

#### 7.2. Objectives

- 7.2.1. Each time the Company calculates a *baseline*, they shall set *objectives* for the next 12 months. Objectives shall be organized by *source type* and shall represent both a percentage increase in sales of products from *acceptable source types* and a percentage decrease in products whose source type is *unknown/unacceptable*.
  - 1. Once FSC Chain of Custody certification is achieved, sales of FSC certified product shall increase as a percentage of total sales on an annual basis unless justified to the certification body.<sup>16</sup>
- 7.2.2. Objectives shall be ambitious yet achievable.
  - 1. If a Company has the ability to advance from one Tier to the next, then it shall.
- 7.3. Compliance with RPP Tiers
  - 7.3.1. Prior to its initial RPP CoC audit, the Company shall establish and document a strategy for dealing with products whose source type is *unknown/unacceptable*.
  - 7.3.2. Before moving to Tier 2 of the RPP and in no more than 36 months of the Company's initial RPP CoC audit, the Company must:
    - 1. Obtain FSC Chain of Custody certification.
    - 2. Eliminate all products whose source type is unknown/unacceptable.
    - 3. Assess all of its wood supply against FSC Controlled Wood standards and provide a report to NWFA documenting where they stand for benchmarking purposes.

<sup>&</sup>lt;sup>16</sup> Please see definition of *justifiable constraint* in Appendix 1. RPP-STN-V1\_041210.doc

Within 24 months of moving to Tier 2 of the RPP, the Company shall meet FSC Controlled Wood standards for all of their non FSC-certified wood supply.

## **Appendix 1: Definition of Terms**

Acceptable Source: is wood that has been determined to come from one of the following sources: FSC-Certified sources from any region; Domestic sources from U.S. States where hardwood growth exceeds mortality and removals; Verified Legal sources from any region; or imported sources from countries where illegal logging is considered low risk.

*Baseline:* Represents an initial assessment of annual sales per *source type* from which to base future forecasts and objectives.

Chain of Custody (CoC): The succession of ownership of wood products from the forest through each stage of manufacturing and distribution to the final consumer.

Claim: Statement made on invoices or shipping documents for RPP compliant material. When 100% of the wood in a product is from a U.S. Renewing Forest a corresponding claim of "RPP Renewing" shall be included in the line item. The claim "RPP Legal" shall be used when no wooden component in a product is unknown/unacceptable per the definitions of this standard.

CoC: See Chain of Custody

Corrective Action Request (CAR): Advice of a non-conformance with a standard (such as the RPP Standard or the FSC Chain-of-Custody Standard) issued by an auditor to a company in the wake of an annual audit; generally, a CAR is issued with instructions and a deadline for its resolution. Failure to resolve CARs will result in the suspension of chain-of-custody certification (see above).

*Country of Origin:* The country where the wood was originally harvested from the forest, which is not necessarily the country where the product was manufactured or traded. Countries not considered low risk for illegal logging: As determined by the FSC Global Forest Risk Registry; Countries not considered low risk for illegal logging appear in red on the map and are referred to as being of "unspecified risk."

FSC-accredited Certification Body: An organization that has been authorized by the Forest Stewardship Council to conduct forest management and/or chain of custody audits to FSC standards. A complete listing of FSC-accredited certification bodies can be found at this website: FSC-accredited certifiers

FSC Certified: One of the Acceptable Source Types in the RPP. Wood derived from a wellmanaged forest, recycled and controlled sources as defined by the FSC. For the wood to be considered "certified" it must be delivered and described on an invoice as "FSC Pure", "FSC Mixed", or "FSC Recycled" material from a company holding a valid FSC chain of custody certificate per www.fsc-info.org.

FSC Controlled Wood: Wood that has been screened to not include any of the five controversial sources identified in the FSC Controlled Wood Standard (FSC-STD-40-005 v2-1): 1. Illegally harvested wood; 2. Wood harvested in violation of traditional and civil rights; 3. Wood harvested in forests where high conservation values are threatened by management activities; RPP-STN-V1\_041210.doc

4. Wood harvested in forests being converted to plantations or non- forest use; 5. Wood from forests in which genetically modified trees are planted.

*FSC Procurement Group:* An initiative of NWFA and the RPP 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.

Justifiable constraint: A limitation beyond the control of the company that is documented and accepted by the certification body as a valid and reasonable explanation as to why they were unable to meet a requirement.

*Legal or RPP Legal:* One of the Acceptable Source Types in the RPP. An designation given to wood that is either a) imported FSC Controlled Wood (see above); b) from sources that have undergone VLO by an NWFA-approved legality verifier (see below); c) sourced from countries considered low risk for illegal logging; or d) sourced from U.S. states where hardwood growth does not exceed loss and/or that do not avoid controversial sources

*NWFA-approved Legality Verifier:* An organization that conducts audits for Legal Harvest Verification or VLO (see below) and that has been determined to meet NWFA's standards for credible legality verification (see RPP Program Document, Appendix 1). *Other Acceptable Source:* One of the Acceptable Source Types in the RPP. It includes Postconsumer Recycled Wood, Pre-Consumer Recycled Wood, and Salvaged Wood (see below).

Other acceptable: Wood products originating from non-virgin sources (Recycled (pre/post) or Salvaged) where records and other documented evidence suggests the material meets the definitions for recycled and salvaged according to this standard.

*Post-consumer Recycled Wood:* Wood or wood fiber that has been reclaimed from an end-user after being used for its intended purpose. End-users may include individuals, households or industrial users of the product.

*Pre-consumer Recycled Wood:* Wood or wood fiber that is created as a by-product of a secondary manufacturing process and is not typically re-used on-site in the same process that generated it.

*Precautionary approach:* Within the context of this standard the precautionary approach shall be defined as a high level of risk aversion by the Company; meaning that sources are to be considered *unacceptable/unknown* unless all evidence suggests they are *acceptable*.

*Primary supplier:* Any supplier of logs/roundwood or processor of logs/roundwood into primary products (e.g. veneer, rough lumber, chips and sawdust)

*Salvaged Wood:* Wood or wood fiber that comes from logs that have been salvaged from the following sources: post-agricultural (e.g. fruit and nut orchards); urban forests (street trees); waterways (sunken logs raised from rivers, reservoirs, and lake bottoms); and other sources reviewed and approved as salvaged by NWFA and SCS.

*Source Type*: Refers to the classes of *acceptable* and *unknown/unacceptable* sources used throughout the RPP. The Source Types are as follows:

- 1. Unknown/Unacceptable
- 2. Acceptable
  - 2.1. FSC Certified
  - 2.2. RPP US Renewing Forests
  - 2.3. RPP Legal
  - 2.4. Other Acceptable

*Unknown/unacceptable Source:* Any source of wood that cannot be considered acceptable in the context of this standard. Such sources include uncertified and unverified wood from a non-low risk country (in regard to illegal logging and per the <u>FSC Global Forest Risk Registry</u>), wood that lacks a credible supplier declaration or wood that is of a suspicious nature.

*US Renewing Forests or RPP Renewing Forests:* One of the Acceptable Source Types in the Responsible Procurement Program. A designation given to hardwood forests based on five-year, statewide statistics from the USDA Forest Inventory and Analysis whereby hardwood growth is equal to or greater than removals and mortality measured in volume. <sup>17</sup>A prerequisite for this designation is that that the forest is located in a state or region considered low risk for the five controversial sources identified in the *FSC Controlled Wood* Standard (FSC-STD-40-005 v2-1). US Renewing Forest can be considered functionally equivalent to "sustainable yield" at the US State-level; however it is not meant to suggest or imply sustainable forest management

*Verified Legal Origin (VLO) or Legal Harvest Verification:* Can be considered functionally equivalent to having the Legal Right to Harvest, and 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.<sup>18</sup>

<sup>&</sup>lt;sup>17</sup> 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

## Appendix 2 – Example of a Procurement Policy

Please include a Procurement Policy like the one below on Company letterhead, signed by a senior executive and posted publicly, e.g. Company website.

## **Company's Responsible Wood Procurement Policy**

It is the policy of Company to procure and sell wood and wood products originating from responsible sources. To that end, Company commits to increasing our wood purchases from responsible known sources and to avoiding wood from controversial sources. Company has appointed Mr/Ms Smith as the contact person responsible for implementing this policy.

The following are considered responsible sources within the context of this policy and in conformance with Tier 1 of the Responsible Procurement Program:

- 5) FSC-Certified Wood
- 6) U.S. Renewing Forest
  - a) The forest of origin is located in a U.S. State where the volume of hardwood growth meets or exceeds mortality and removals, AND
  - b) The forest of origin is located in a U.S. State or sub region considered 'low risk' for violations of traditional or civil rights; management activities that threaten high conservation values; contain plantations of genetically modified trees; illegal logging or conversion from natural forest to plantations or non-forest uses.
- 7) Legal
  - a) Countries deemed to be low risk in terms of illegal logging, OR
  - b) legal harvest has been determined through credible independent verification
- 8) Pre and Postconsumer Recycled Wood

Company is committed to making best efforts to identify the sources of wood used in the manufacture and sale of our products but recognizes the difficulty in achieving 100% certainty. For this reason Company invites stakeholders to contact us by Describe how and who to address formal complaints to and issue a formal complaint if it is believed that we are not meeting this policy. Company makes the following commitments towards efficient processing and responses to all valid complaints; Company shall:

- ✓ Evaluate and respond to complaints within 2 weeks;
- ✓ Investigate all complaints within 2 months;
- Immediately halt the use of wood found not to be in line with the Company's procurement policy;
- ✓ Maintain records for all complaints and actions taken to be made available to a third party auditing organization.

Signature of Senior Executive Date

#### Appendix 3 – Example Supplier Declaration Form

## RESPONSIBLE PROCUREMENT PROGRAM (RPP) SUPPLIER DECLARATION FORM

**Please Note:** The USDA's APHIS (Animal and Plant Health Inspection Service) Plant and Plant Product Declaration Form or copy shall be used in place of this form for all products imported to the United States of America.

**Applicability of Declaration:** As part of the RPP you are expected to have a declaration that corresponds to every wood purchase of non-FSC-certified and/or non-FSC-controlled material. For countries outside the United States of America only the country of harvest is needed for each product. For the United States information on the US State(s) is also needed. This form shall be completed at least annually and when necessary to inform the buyer of additional species and/or harvest locations.

1. DATE OF DECLARATION: (MM/DD/YYYY)	2. BILL OF LADING OR SHIPPING DOCUMENT W/ NUMBER:
3. SELLER NAME:	4. SELLER ADDRESS:
3. SELLER NAIVIE.	4. SELLER ADDRESS:
5. PURCHASER NAME:	6. PURCHASER ADDRESS:

#### Section 1 – Shipment Information

I certify that the information furnished is true and correct and commit to informing the purchaser when species and harvest locations change:						
Signature	Type or Print Name					

## **SECTION 2**

Please provide the following information:

Please provide the following	information:			
7. COMPLETE DESCRIPTION OF WOOD PRODUCTS SUPPLIED TO PURCHASER - e.g. species, type of product (lumber, log, veneer, plywood, HDF,	8. COUNTRY, STATE(S) or PROVENCE OF HARVEST	9. DISTRICT(S). COUNTY(IES) OR FOREST(S) OF HARVEST IF KNOWN	10. CHAIN OF CUSTODY CERTIFICATION, IF ANY – e.g. FSC,PEFC, RPP, VLO, LHV, etc.	10. ESTIMATED ANNUAL VOLUME OF MATERIAL SUPPLIED (Shall include unit of measure)
etc.), grade				
	1	1		

I certify that the information furnished is true and correct and commit to informing the purchaser when species and harvest locations change:

 Signature
 Type of Print Name
 Date

## Appendix 4 – Example Purchase Log

## NWFA RPP Purchase Log

				Volume by Source bf						
Purchase Date	PO Number	Species	Region (US State or Country)	FSC- Certified	US Renewing Forest	FSC- Controlled	Low Risk Country	Verified Legal	Unknown	Total
1/1/2009	8346	Red Oak	TN		5000					5000
1/2/2009	8347	Radiata Pine	New Zealand				2000			2000
1/2/2009	8348	lpe	Brazil						2000	2000
										0
										0
										0
										0
										0
										0
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										0
										0
										0
										0
										0
										0
Total				0	5000	0	2000	0	2000	9000

## Appendix 5 – Example Sales Log

### RPP Sales Log Example

		Volume (bf) by Source						
Sales Date	Invoice No.	FSC-Certified	US Renewing Forest	FSC-Controlled	Low Risk Country	Verified Legal	Unacceptable/ unknown	Total
1/1/2009	10001		1000		-	_		1000
1/2/2009	10002						200	200
1/3/2009	10003				1500			1500
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
								0
Total		0	1000	0	1500	0	200	2700
Percent Sales of Total		0%	37%			56%	7%	
		FSC-Certified	US Renewing Forest	Other Acceptable	Sources		Unacceptable/ unknown	

Volume (bf) by Source