

FSC Controlled Wood Due Diligence Summary

Small Business Certification Network in Windsor, Colorado, United States

Prepared by Ted Hendrickx on March 12, 2021

Note: as of October 5, 2019, all Controlled Wood Certificate Holders (CH) sourcing materials that they wish to control from the conterminous United States (excludes Alaska, Hawaii and US Territories) must have updated their DDS to incorporate the FSC US National Risk Assessment. Sourcing from Alaska, Hawaii or US Territories requires a company risk assessment. Sourcing from Canada, either directly, or indirectly due to logical supply area overlap, requires incorporation of the FSC CAN National Risk Assessment.

When complete, this form will meet the requirements in Section 6 of FSC-STD-40-005 V3-1 "Publicly Available Information".

1. Due Diligence System information:

Description of Supply Area	Risk Designation	Indicator(s) for Supply Area Specified Risk Designation	Risk Assessment
Maryland (no specified risk counties)	Low Risk	Indicators 1, 2, and 5	FSC-NRA-USA v.1-0
	Specified Risk (if applicable by sourcing areas)	No specified risk sourcing area overlap for indicators 3 or 4	
Pennsylvania (Bedford and Clearfield counties)	Low Risk	Indicators 1, 2, and 5	FSC-NRA-USA v.1-0
	Specified Risk	HCV 3: Mesophytic Cove Sites	
West Virginia (Braxton, Nicholas, and Webster counties)	Low Risk	Indicators 1, 2, and 5	FSC-NRA-USA v.1-0
	Specified Risk	HCV 3: Mesophytic Cove Sites	
Canadian Provinces: None currently in the sourcing areas of any members	Low Risk		FSC-NRA-CA V2-0
	Specified Risk (if applicable by sourcing areas)	List all applicable SRAs, Ex: IFLs, Woodland Caribou, Blanding's Turtle	

2. Complaints

Procedure for filing complaints	<p>Our complaints procedure consists of the following steps and will be completed within two weeks of receiving the initial complaint:</p> <ol style="list-style-type: none"> 1. We will acknowledge receipt of the complaint via email whenever possible. When an email address is not provided (or refused by request) by the complainant, we will send a written acknowledgement via US postal mail <ol style="list-style-type: none"> a. Anonymous complaints, or complaints where a mailing address or email address are not provided, will be considered invalid and will not be acknowledged. 2. We will conduct a preliminary assessment to determine the substance of any comment or complaint. Complaints will be defined as “substantial” or “not substantial”. <ol style="list-style-type: none"> a. This assessment will include, but not be limited to, the breadth and/or specificity of the complaint, and the standing of the complainant. <ol style="list-style-type: none"> i. Lack of specificity and standing will automatically be considered “not substantial” ii. Complaints not related to our risk assessment or supply area will automatically be considered “not substantial” iii. High specificity and standing complainants, with complaints that are related to our risk assessment or supply area, will be reviewed on a case-by-case basis for substance.
Contact information of the person or position responsible for addressing complaints	SBCN Group Manager 888-662-8854 x 3

3. Control Measures

Mark the applicable box below:

All sourcing areas are **low risk**; therefore, the following items are not applicable:

- Control measures
- Company led stakeholder consultation
- Technical experts
- Field Verifications of the FMU or supply chain

X Some sourcing areas are **specified risk** areas; therefore, the following items may be applicable and are being implemented by the certificate holder as appropriate and necessary:

- Control measures **See Below**
- Company led stakeholder consultation (for CH-developed control measures) **See Below**
- Technical experts (for CH-developed control measures) **See Below**
- Field Verifications of the FMU or supply chain (for CH-developed control measures or further delineating supply area risk) **See Below**

Assessment Indicator Requiring Control Measure(s)	Control Measures Per Indicator
3.1 Wood harvested from forests in which high conservation values are threatened by management activities	3.1 a. Educational materials, and landowner outreach or coordination with a local conservation organization, as determined by the specified risk area.

Assessment Indicator Requiring Control Measure(s)	Control Measures for Addressing Risk of Supply Chain Mixing of Unacceptable or Non-eligible Sources
n/a	<p><i>There is no risk of mixing controlled and unacceptable material in our wood basket during transport, processing, and storage because the entirety of the wood basket for current certification group members is either low risk or we have implemented mitigation measures required by FSC-US NRA, as appropriate to the situation.</i></p> <p><i>Members have implemented a sampling procedure for their purchases at the supply unit of origin, utilizing the American Green Controlled Material Purchasing Checklist or other documented means, to verify the absence of unacceptable sources in their supply chain during transportation, processing, or storage.</i></p>

Stakeholder Consultation, Technical Experts, and Field Verifications
<p>Company utilizes the American Green Consulting Group's Mitigation Action Plan, which is based on suggested mitigation from the FSC-US NRA Mitigation Guidance documents as well as FSC-US notes from regional meetings.</p> <p>While the information included in American Green educational materials is all based on publicly available research, the following experts are partnering with AGC in creating the noted materials.</p> <p>Ecoforesters - Mesophytic Cove Sites</p> <ul style="list-style-type: none"> Ecoforesters is active throughout Appalachia. Information about their work may be found here: https://www.ecoforesters.org/positive-impact-forestry/ Qualifications of Ecoforesters staff may be found here: https://www.ecoforesters.org/about-us/meet-the-team/