

Public Notification Letter

FSC® Chain of Custody Controlled Wood Stakeholder Consultation

To: Interested Parties

From: SCS Global Services

Consultation period: 9/03/2025 – 10/15/2025

Re: Notification of intent to audit **Swiss Krono OR, LLC** against FSC Chain of Custody Controlled Wood standard FSC-STD-40-005 V3-1

The Forest Stewardship Council® (FSC) requires that a certification body conducting an audit of a certified organization or applicant must consult stakeholders whenever the audit includes intent to source and use uncertified material in an FSC Chain of Custody (CoC) program according to the requirements in FSC-STD-40-005 V3-1 “Requirements for Sourcing FSC Controlled Wood”. Therefore, SCS Global Services (SCS) is seeking input from interested and directly affected stakeholders regarding the relevance, effectiveness, and/or adequacy of **Swiss Krono OR, LLC** Due Diligence System (DDS).

An explanation of ‘FSC Controlled Wood’, as well as a copy of FSC-STD-40-005 V3-1, is available here: <https://ic.fsc.org/en/certification/types-of-certification/controlled-wood-02> ; a copy of this standard is also available from SCS upon request.

Due Diligence Systems are required for certified organizations in order to avoid the sourcing and use of material originating from unacceptable sources in their FSC CoC program.

Directly affected stakeholders include any person, group of persons, or entity that is, with high probability, subject to the effects of the activities related to an organization’s controlled wood sourcing program, including the activities of their suppliers and sub-suppliers, as well as those who influence risk identified through the organization’s Due Diligence System.

This letter serves as SCS’ invitation to directly affected stakeholders to participate in our consultation process. This letter also serves as SCS’ public notification for any interested stakeholders, who are also invited to participate in the consultation process. Participation in this stakeholder consultation process is voluntary; stakeholders are not required to submit comments.

Scope of audit and audit details:

The audit will assess the conformity of the organization’s controlled wood program – including Risk Assessment(s) and DDS – according to the certification requirements as per FSC-STD-40-005 V3-1.

The company’s DDS Public Summary and Risk Assessment (excluding confidential information), as well as any other information or documents deemed relevant for the purpose of this stakeholder consultation, are included as appendices to this letter—see below. For a list of the information that is required to be publically available for stakeholder consultation by SCS, see FSC-STD-40-005 V3-1, Section 6.

Additional certificate holder information:

Options for participation and provision of comments:

Please submit written comments and evidence (where appropriate) by mail, FAX or email to SCS:

SCS Global Services
Att'n: Chain of Custody Certification Services
2000 Powell Street, Suite 600
Emeryville, CA 94608

Fax: 510-452-6882

Email: CWStakeholder@SCSGlobalServices.com

A summary of the stakeholder consultation and comments received will be made publically available on the FSC certificate database, as per FSC-STD-20-011 V4-2. Verbatim comments will only be published with prior consent from the stakeholder and will not be associated with stakeholder names.

Note that, while SCS is required to evaluate all information and comments objectively, SCS certification decisions are affected by stakeholder comments only insofar as the comments provide evidence of conformity or nonconformity to the applicable requirements.

Within 30 days of making our certification decision, SCS will respond to all stakeholders who provided comments to explain how their comments were taken into account.

More information about FSC and SCS can be found on our respective websites: www.fsc.org and www.scsglobalservices.com.

Publicly Available Information for Organizations Certified to the FSC Controlled Wood Standard (FSC-STD-40-005)¹

Organization Name	Swiss Krono OR, LLC
FSC COC Certificate Number	

1. Procedure for Filing Complaints

Name of Authorized Representative / Position Responsible	Luciana Cardoso Fonseca (American Green Consulting) / Due Diligence Officer
Contact Detail (Contact information for person or position responsible for addressing complaints)	Luciana Cardoso Fonseca (Due Diligence Officer) +55 41 992027286 luciana@americangreenconsulting.com
Procedure for filing complaints	<p>Note: The complaint procedure shall indicate the <u>timelines</u> and <u>processing steps</u> when a complaint is received. For further details on complaints procedure, see section 7 in FSC-STD-40-005</p> <h3>Stakeholder Input and Complaints</h3> <p>Our stakeholder procedure (7.1) consists of the following steps (7.2), 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 is refused upon request) by the complainant, we will send a written acknowledgement via US mail. (7.2.a)<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. Our initial acknowledgement will include the complaint procedure as outlined in our Due Diligence System Public Summary. (7.2.b)3. We will conduct a preliminary assessment to determine the substance of any comment or complaint. Complaints will be defined as “substantial” or “not substantial”.

¹ This document is meant as guidance only, utilization of templates and guidance documents is no guarantee of conformity with FSC requirements. It is your organization’s responsibility to conform to relevant FSC requirements.

- a. This assessment will include, but not be limited to, the breadth and/or specificity of the complaint, and the standing of the complainant. (7.2.d)
 - 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.

We will forward complaints related to risk designations in the relevant FSC risk assessment to the identified responsible bodies that must be notified of such complaints (7.2.c). Our Due Diligence Compliance Officer will be responsible for overseeing the response to any complaint.

“Not Substantial” Complaints

For complaints determined “not substantial”, notification of the findings and resolution of the complaint will be sent to our Certification Body, the complainant, and FSC-US. (7.2.l)

“Substantial” Complaints

Complaints that are determined to be substantial will trigger a dialogue between our organization and the complainant with the goal of reaching a satisfactory resolution for all sides. This process will be overseen by our Due Diligence Officer. (7.2.e)

Complaints that are determined to be substantial will be sent via email to our Certification Body and FSC national office contact persons (7.2.f). This notification will include:

- Information suitable to accurately define the complainant and complaint
- Steps taken to date by our organization to respond to the complaint
- Clear definition of how steps taken to date incorporate a ‘precautionary approach’ to the complaint concerns. (7.2.g)

When a “substantial” complaint is determined, the following actions will be taken within two months of receipt of the complaint:

- A formal verification of the issue will be implemented and recorded by our Due Diligence Officer, or his/her designee. (7.2.h)
 - This verification will include explicit steps to mitigate the conditions of the complaint, or a determination of exclusion for the supplier or area affected by the complaint will be made. (7.2.i)

	<ul style="list-style-type: none"> • Proof of the implementation of the determined steps, or system of exclusion, will be provided and recorded (7.2.j-k) • Notification of the findings and results of substantial complaints, and the resolution and verification of the complaint will be sent to our Certification Body, the complainant, and FSC-US. (7.2.l) <p>Supporting Documents</p> <ul style="list-style-type: none"> • Initial Complaint Assessment form • Substantial Complaint Resolution form
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2. Summary of Organization’s Due Diligence System

Information regarding an organization’s due diligence system must be made publically available. This publically available information may be provided within this summary document, or as separate documentation. Please selection an option below.

☒ **DDS Summary is provided in a separate Annex. Provide name of document or summary location:** Swiss Krono DDS 2025 – Due Diligence Public Summary – August 28th 2025

 (e.g. <http://www.xxcompany.com/dds> or Annex XXX., written summary of DDS XXX)

☐ **DDS summary is provided in this document. Complete sections 3 through 8.**

3. Description of the Supply Area(s) and Respective Risk Designation(s)

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
XX region, XX country	Category 1	Choose an item.	<input type="checkbox"/> FSC risk assessment <input type="checkbox"/> Extended Company Risk Assessment	e.g. FSC-NRA-DE V1-0 ECRA-CW-xx country V1
	Category 2	Choose an item.		
	Category 3	Choose an item.		
	Category 4	Choose an item.		
	Category 5	Choose an item.		

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
XX region, XX country	Category 1	Choose an item.	<input type="checkbox"/> FSC risk assessment <input type="checkbox"/> Extended Company Risk Assessment	e.g. FSC-NRA-DE V1-0 ECRA-CW-xx country V1
	Category 2	Choose an item.		
	Category 3	Choose an item.		
	Category 4	Choose an item.		
	Category 5	Choose an item.		

NOTE:

- The description of the supply area should allow the identification of the area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category.
- The risk designation provided in the table is the designation provided by the risk assessment PRIOR to the application of control measures.

Please copy and paste tables to insert more source area(s) as needed.

4. Description of the Supply Chain Risk Assessment and Respective Risk Designation(s)

Supply chain sourcing area / Supply chain actor	Description of Risk Assessment (risk of mixing material with non-eligible inputs in the supply chain/s during transport, processing, and storage)	Risk Level (Low/Specified)
		Choose an item.
		Choose an item.
		Choose an item.

5. Control Measures Implemented by the Organization

- ☐ Not Applicable - All risk designations from the supply area risk assessments and supply chain risk assessments are low risk. *Skip to section 6.*

Sourcing Area/Supply chain area	Indicator with specified risk	Description of Control measure

Sourcing Area	Indicator with specified risk	Description of Control measure

Note: Please copy and paste additional tables as needed.

6. Stakeholder Consultation Summary

☐ **Not Applicable** - The organization did not engage in a formal stakeholder consultation process. *Skip to section 7.*

The areas for which the stakeholder consultation has been conducted (e.g. geo-reference data, state, province, supply unit)			
	(e.g. geo-reference data, state, province, supply unit)		
Stakeholder engagement date(s):			
Means of Contact, please check all that apply			
<input type="checkbox"/> Face to face meetings <input type="checkbox"/> Personal contacts by phone <input type="checkbox"/> Email, or letter <input type="checkbox"/> Notice published in the national and/or local press		<input type="checkbox"/> Notice published on relevant websites <input type="checkbox"/> Local radio announcements <input type="checkbox"/> Local customary notice boards <input type="checkbox"/> Social media broadcast	
List of the stakeholder groups invited by the organization to participate in the consultation, please check all that apply			
<input type="checkbox"/> Economic interests <input type="checkbox"/> Social interests <input type="checkbox"/> Environmental interests <input type="checkbox"/> FSC-accredited certification bodies active in the country <input type="checkbox"/> National and state forest agencies		<input type="checkbox"/> Experts with expertise in controlled wood categories <input type="checkbox"/> Research institutions and universities <input type="checkbox"/> FSC regional offices, FSC network partners, registered standard development groups and NRA working groups in the region	
Summary of the stakeholder comments received and considerations			

Stakeholder comment	
Consideration	
Stakeholder comment	
Consideration	
The organization's justification for concluding that the material sourced from these areas can be used as controlled material or sold with the FSC Controlled Wood claim	
<p>Note: Comments shall only be published with prior consent from the consulted stakeholder and not associated with stakeholder's personal identifiable information.</p>	

7. Expert Engagement Summary

☐ **Not Applicable - The organization did not engage experts in the development of control measures. *Skip to section 8.***

Expert A	
Qualification	
Scope of Service	

Expert B	
Qualification	
Scope of Service	

NOTE: For individual experts this includes the experts' qualifications and the scope of their services. The personal identifiable information such as names of experts, their license/registration numbers (if applicable) shall only be included with given consent from experts. For publicly available expertise, the specific sources of information shall be cited.

Note: Please copy and paste additional tables as needed.

8. Field Verification Summary

☐ **Not Applicable - The organization did not conduct field verification as a control measure.**

Findings from field verification	
Steps taken by the organization to address identified non-conformities	

Findings from field verification	
Steps taken by the organization to address identified non-conformities	

Note: Please copy and paste additional tables as needed.

The confidential nature of the information may be determined by the legislation that the organization must comply with. Commercially sensitive information, and the names of individual landholders, shall be treated as confidential information.	
<input type="checkbox"/> Not Applicable - The organization has not excluded confidential information.	
The organization's justification for the exclusion of confidential information.	

FSC Controlled Wood Due Diligence

Summary

Swiss Krono OR in Klamath Falls, Oregon, United States

Prepared by Luciana Fonseca, American Green Consulting Group on August 28th, 2025.

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
California	<i>Low Risk</i>	1, 2, 5	FSC-NRA-USA v.1-0
	<i>Specified Risk</i>	<i>Old Growth Forests</i> <i>Klamath-Siskiyou CBA</i> <i>Central CA CBA (at 200-mile radius)</i> <i>Conversion</i>	
Oregon	<i>Low Risk</i>	1, 2, 5	FSC-NRA-USA v.1-0
	<i>Specified Risk</i>	<i>Old Growth Forests</i> <i>Klamath-Siskiyou CBA</i> <i>Conversion</i>	
Washington	<i>Low Risk</i>	1, 2, 5	FSC-NRA-USA v.1-0
	<i>Specified Risk</i>	<i>Old Growth Forests</i> <i>Conversion</i>	
Idaho	<i>Low Risk</i>	1, 2, 3, 5	FSC-NRA-USA v.1-0

	<i>Specified Risk</i>	<i>Conversion</i>	
Montana	<i>Low Risk</i>	1, 2, 4, 5,	FSC-NRA-USA v.1-0
	<i>Specified Risk</i>	<i>Old Growth Forests</i>	

2. Control Measures

<p>Mark the applicable box below:</p> <p>All sourcing areas are low risk; therefore, the following items are not applicable:</p> <ul style="list-style-type: none"> Control measures Company led stakeholder consultation Technical experts Field Verifications of the FMU or supply chain 	
<p>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:</p> <ul style="list-style-type: none"> Control measures See Below Company led stakeholder consultation (for CH-developed control measures) n/a 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) n/a 	
Assessment Indicator Requiring Control Measure(s)	Control Measures Per Indicator
3.3 Wood harvested from forests in which high conservation values are threatened by management activities – Old Growth	3.3a Swiss Krono OR attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.
	<p>3.3b Continue or Implement actions identified in the Controlled Wood Regional Meetings:</p> <p>Logs sourced from other FSC-Certified forests in Specified Risk Areas are under the FM standard FSC-STD-01-001 and therefore are compliant with old-growth harvest restrictions.</p> <p>Mitigation element Procurement Policy is used for controlling outside log procurement. Our Controlled Material Purchasing Checklist ensures old-growth will not be harvested.</p> <p>Mitigation element Education/Outreach is used for increasing awareness of Old-Growth Specified Risk Areas to help ensure old-growth will not be harvested.</p>

3.1 Wood harvested from forests in which high conservation values are threatened by management activities – Klamath-Siskiyou CBA	3.1a Swiss Krono OR attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.
	<p>3.1b Continue or Implement actions identified in the Controlled Wood Regional Meetings:</p> <p>As part of Mitigation element Education/Outreach, Swiss Krono OR distributes information sheets about relevant specified risk areas (SRAs) or topics, and has each supplier sign a Supplier Declaration Form, indicating whether they source from SRAs or areas of HCV. If a supplier sources from SRAs, the information sheets provided to suppliers have recommendations for BMPs and mitigation options with the intent to result in changes to on-the-ground forest management activities that improve maintenance or enhancement of Klamath-Siskiyou biodiversity, and thereby mitigate the risk of sourcing materials from sites where the concentration of biodiversity in the specified risk area is threatened by forest management activities.</p>
3.3 Wood harvested from forests in which high conservation values are threatened by management activities – Mesophytic Cove Sites	3.3 a. Swiss Krono OR attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.
	<p>3.3 b. Continue or Implement actions identified in the Controlled Wood Regional Meetings:</p> <p>As part of Mitigation element Education/Outreach, Swiss Krono OR distributes information sheets about relevant specified risk areas (SRAs) or topics, and has each supplier sign a Supplier Declaration Form, indicating whether they source from SRAs or areas of HCV. If a supplier sources from SRAs, the information sheets provided to suppliers have recommendations for BMPs and mitigation options intended to result in changes to on-the-ground forest management activities that improve maintenance or enhancement of MCS, and thereby mitigate the risk of sourcing materials from sites where MCS in the specified risk area are threatened by forest management activities.</p>
3.1 Wood harvested from forests in which high conservation values are threatened by management activities – Central Appalachian CBA	3.1a Swiss Krono OR attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.
	<p>3.1b Continue or Implement actions identified in the Controlled Wood Regional Meetings:</p> <p>As part of Mitigation element Education/Outreach, Swiss Krono distributes information sheets about relevant specified risk areas (SRAs) or topics, and has each supplier sign a Supplier Declaration Form, indicating whether they source from SRAs or areas of HCV. If a supplier sources from SRAs, the information sheets provided to suppliers have recommendations for BMPs and mitigation options and are provided with the intent of resulting in the maintenance of forests, and thereby</p>

	mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.
3.1 Wood harvested from forests in which high conservation values are threatened by management activities – California CBA	<p>3.1a Swiss Krono OR attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.</p> <p>3.1b Continue or Implement actions identified in the Controlled Wood Regional Meetings:</p> <p>As part of Mitigation element Education/Outreach, Swiss Krono OR distributes information sheets about relevant specified risk areas (SRAs) or topics, and has each supplier sign a Supplier Declaration Form, indicating whether they source from SRAs or areas of HCV. If a supplier sources from SRAs, the information sheets provided to suppliers have recommendations for BMPs and mitigation options intended to result in changes to on-the-ground forest management activities that improve maintenance or enhancement of MCS, and thereby mitigate the risk of sourcing materials from sites where MCS in the specified risk area are threatened by forest management activities.</p>
4.1 Wood from forests being converted to plantations or non-forest use	<p>4.2 a. Swiss Krono OR attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.</p> <p>4.2.b. Educational materials, and landowner outreach or coordination with a local conservation organization, as determined by the specified risk area.</p>
3 and 4	Avoidance – company avoids harvest in areas of specified risk using the US NRA. They do not harvest any Old Growth in CA or OR as they measure circumference of all timber to avoid this. They also avoid harvest from areas where the Lesser Slender Salamander lives.

Assessment Indicator Requiring Control Measure(s)	Control Measures for Addressing Risk of Supply Chain Mixing of Unacceptable or Non-eligible Sources
<i>3.1 and 3.3 Wood harvested from forests in which high conservation values are threatened by management activities</i>	Swiss Krono OR purchases material from suppliers within its defined supply areas as either non-certified or certified with FSC claims. Contracts provide requirements of Swiss Krono for suppliers that deliver wood to the Swiss Krono site. Supplier inquiries are conducted via phone or email to determine sourcing areas and identify sub-suppliers for co-products in the supply chain.

Stakeholder Consultation, Technical Experts, and Field Verifications

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.

While the information included in American Green educational materials is all based on publicly available research, the following experts partnered with AGC in creating the noted materials.

The Forest Stewards Guild – *Old Growth, Conversion*

- Areas where the Forest Stewards Guild is active may be found here: <https://foreststewardsguild.org/where-we-work/>
- Qualifications of Forest Stewards Guild staff may be found here: <https://foreststewardsguild.org/meet-the-team/>

Pacific Forest Trust – *Klamath-Siskiyou CBA*

- Information about the work of Pacific Forest Trust may be found here: <https://www.pacificforest.org/what-we-do/>
- Qualifications of Pacific Forest Trust may be found here: <https://www.pacificforest.org/about-us/>

3. 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">4. 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.5. We will conduct a preliminary assessment to determine the substance of any comment or complaint. Complaints will be defined as “substantial” or “not substantial”.
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	<p>a. This assessment will include, but not be limited to, the breadth and/or specificity of the complaint, and the standing of the complainant.</p> <ul 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 with complaints that are related to our assessment or supply area, will be reviewed on a case-by-case basis for substance. <p>complainants,</p> <p>risk</p> <p>reviewed on</p>
Contact information of the person or position responsible for addressing complaints	<p>Multisite Manager, American Green Consulting Group,</p> <p>Luciana Cardoso Fonseca</p> <p>+55 41 992027286</p>