

Public Notification Letter

FSC® Chain of Custody Controlled Wood Stakeholder Consultation

To: Interested Parties

From: SCS Global Services

Consultation period: 4/10/2026 – 5/22/2026

Re: Notification of intent to audit **Small Business Certification Network, 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 **Small Business Certification Network, LLC**’s 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.

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	Low Risk		FSC-NRA-USA v.1-0
	<i>Specified Risk</i>	<i>Forest Conversion</i>	

2. 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
4. Conversion of forest to non forest	ex.4.1 Educational materials and American Green attendance at all required FSC-US mitigation meetings on behalf of Organization

Assessment Indicator Requiring Control Measure(s)	Control Measures for Addressing Risk of Supply Chain Mixing of Unacceptable or Non-eligible Sources
n/a	There is no risk of mixing controlled and unacceptable material in our wood basket during transport, processing, and storage because the entirety of our wood basket is either low risk, or we have implemented mitigation measures required by FSC-US NRA, as appropriate to the situation.

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 are partnering with AGC in creating the noted materials.

The Forest Stewards Guild – *Central Appalachian CBA, Conversion, Klamath Siskiyou CBA, Late Successional Bottomland Hardwoods, Native Longleaf Pine Systems**, *Old Growth Forests, Southern Appalachian CBA*

- 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/>

* Additional expertise for *Native Longleaf Pine Systems* was provided by Justin L. Hart, Professor & Director, Environmental Science Program, The University of Alabama

Ecoforesters - *Mesophytic Cove Sites*

- 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/>

The Amphibian and Reptile Conservancy – *Cheoah Bald Salamander, Dusky Gopher Frog, Houston Toad, Lesser Slender Salamander, Patch Nosed Salamander*

- The Amphibian and Reptile Conservancy is a not-for-profit 501(c)(3) charitable organization dedicated to the conservation of amphibians and reptiles. Information about their work may be found here: <https://amphibianandreptileconservancy.org/what-we-do/>
- Qualifications of ARC staff may be found here: <https://amphibianandreptileconservancy.org/about/arc-directors/>

3. Complaints

Procedure for filing complaints	Our complaints procedure consists of the following steps: We will acknowledge the complaint as soon as possible and will provide an initial response to the complaint within two weeks. We will forward complaints related to risk designations in the FSC United States Controlled Wood National Risk Assessment (NRA), as designated within the FSC US NRA.
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	<p>For complaints not related to risk designations in the FSC US NRA:</p> <p>We will conduct a preliminary assessment to determine whether evidence provided in a complaint is or is not substantial. This will be done by assessing the evidence provided against the risk of using the material from unacceptable sources.</p> <p>We will engage in dialogue with the complainants that aims to solve complaints assessed as substantial before further actions are taken.</p> <p>We will forward substantial complaints to our certification body and relevant FSC office for the supply area within two weeks of receiving the complaint. Information on the steps to be taken by us in order to resolve the complaint, as well as how a precautionary approach will be used, will also be included with the complaint.</p> <p>We will employ a cautionary approach towards the continued sourcing of the relevant material while a complaint is pending.</p> <p>We will implement a process to verify a complaint assessed as substantial within two months of its receipt.</p> <p>We will determine the corrective action to be taken by suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded.</p> <p>We will verify whether corrective action has been taken by suppliers and whether it is effective.</p> <p>We will exclude the relevant material and suppliers from our supply chain if no corrective action is taken.</p> <p>We will inform the complainant, our certification body, and relevant FSC office of the results of the complaint and any actions taken towards its resolution, and for maintaining copies of relevant correspondence.</p> <p>We will record and file all complaints received and actions taken.</p>
<p>Contact information of the person or position responsible for addressing complaints</p>	<p>Christopher Gibbons, chris@americangreenconsulting.com, (888) 662-8854 x1</p>