

**Forest Stewardship Council® (FSC®)
Controlled Wood**

**Due Diligence System (DDS)
Public Summary**

November 2019

**USA
Lower 48 States**



2218-D Airport Drive, Campbell River
British Columbia, Canada V9H 0E2

www.zimmfor.com



Table of Contents

Introduction	1
Applicable FSC Risk Assessment(s)	1
Source Areas and Risk Designations	2
US National Risk Assessment Risk Designation, by Risk Value	4
HCV 1 – Species Diversity.....	4
HCV 3 – Rare Ecosystems.....	4
Conversion	4
Control Measures	5
Controlled Wood (CW) Category 3 – High Conservation Values (HCV).....	5
FSC US CW Regional Meetings.....	5
Mitigation Options.....	5
Additional Mitigation Efforts	5
Field Verification Audits – Results	5
CW Category 4 – Conversion.....	6
Complaints and Contact Information	6
FSC US NRA – Map of Specified Risks in the Lower 48 States	7
Appendix 1 – Participating Client List and Applicable Source Areas	8



Introduction

Zimmfor Management Services Ltd. (Zimmfor) is a leader in providing consulting services to the resource management sector, with a focus on certification support related to forest management and chain of custody (CoC) for wood and wood fiber products.

In support of participating client base (refer to Appendix 1), Zimmfor has developed a Due Diligence System (DDS) according to the requirements for Sourcing FSC Controlled Wood (CW) Standard (FSC-STD-40-005 V3-1).

FSC Controlled Wood supports the use of FSC Mix products and the establishes minimum legal, environmental, and social requirements for non-certified fiber that can be mixed in with FSC certified fiber.

The DDS consists of three elements:

- 1) Information Gathering – completed by clients using client specific “Supplier Declarations” or similar documents (e.g., Log Purchase Agreements; Timber Sale Contracts). Supplier Declarations provide information on products and species being sourced, geographic origins of timber harvesting, and includes a commitment from the supplier to assist in completing audits and confirmation of the legality of the wood being sourced.
- 2) FSC Controlled Wood Risk Assessment – the National Risk Assessment (NRA) for the United States (US) was completed by the FSC US Regional Office and approved on April 5, 2019. Applicable source areas are client specific (refer to Appendix 1).
- 3) Risk Mitigation – where source areas or suppliers are deemed to be not-low, or Specified Risk, measures will be implemented to mitigate identified risks. Measures may include:
 - a) physical segregation of uncontrolled material,
 - b) exclusion of suppliers, supply areas, species, or products, or
 - c) implementation of Control Measures identified within the applicable Risk Assessment.

Applicable FSC Risk Assessment(s)

As of October 5, 2019, the FSC US National Risk Assessment (NRA) is the applicable Risk Assessment covering the lower 48 states.

The US NRA can be found at: <https://us.fsc.org/en-us/certification/controlled-wood>.

There are no other applicable Risk Assessments related to these US source areas for the participating Zimmfor clients.



Source Areas and Risk Designations

The source areas and risk designations applicable to the source areas within the USA are listed in Table 1 below.

Table 1: Risk Summary - USA

Supply Areas	NRA Risk Designations				
	1. Illegally Harvested Wood	2. Violation of Traditional or Civil Rights	3. High Conservation Values*	4. Conversion	5. Genetically Modified Trees
Alabama	Low	Low	Specified ^{2,5,7,14,15,16}	Specified ¹⁷	Low
Alaska	Refer to Zimmfor Extended Company Risk Assessment (ECRA)				
Arizona	Low	Low	Low	Low	Low
Arkansas	Low	Low	Specified ¹⁴	Low	Low
California	Low	Low	Specified ^{3,6,11,13}	Low	Low
Colorado	Low	Low	Specified ¹³	Low	Low
Connecticut	Low	Low	Low	Low	Low
Delaware	Low	Low	Specified	Specified ¹⁷	Low
Florida	Low	Low	Specified ^{4,5,14,16}	Specified ¹⁷	Low
Georgia	Low	Low	Specified ^{2,5,7,12,14,15,16}	Specified ¹⁷	Low
Idaho	Low	Low	Specified ¹³	Low	Low
Illinois	Low	Low	Specified ¹⁴	Low	Low
Indiana	Low	Low	Low	Low	Low
Iowa	Low	Low	Low	Low	Low
Kansas	Low	Low	Low	Low	Low
Kentucky	Low	Low	Specified ^{2,14,15}	Low	Low
Louisiana	Low	Low	Specified ^{14,16}	Low	Low
Maine	Low	Low	Low	Low	Low
Maryland	Low	Low	Specified ¹⁵	Specified ¹⁷	Low
Massachusetts	Low	Low	Low	Low	Low
Michigan	Low	Low	Low	Low	Low
Minnesota	Low	Low	Low	Low	Low
Mississippi	Low	Low	Specified ^{9,14,16}	Low	Low
Missouri	Low	Low	Specified ¹⁴	Low	Low
Montana	Low	Low	Specified ¹³	Low	Low



Supply Areas	NRA Risk Designations				
	1. Illegally Harvested Wood	2. Violation of Traditional or Civil Rights	3. High Conservation Values*	4. Conversion	5. Genetically Modified Trees
Nebraska	Low	Low	Low	Low	Low
Nevada	Low	Low	Specified ¹³	Low	Low
New Hampshire	Low	Low	Low	Low	Low
New Jersey	Low	Low	Specified ¹⁵	Low	Low
New Mexico	Low	Low	Low	Low	Low
New York	Low	Low	Low	Low	Low
North Carolina	Low	Low	Specified ^{1,2,8,14,15,16}	Specified ¹⁷	Low
North Dakota	Low	Low	Low	Low	Low
Ohio	Low	Low	Specified ^{14,15}	Low	Low
Oklahoma	Low	Low	Low	Low	Low
Oregon	Low	Low	Specified ^{6, 13}	Specified ¹⁷	Low
Pennsylvania	Low	Low	Specified ^{14,15}	Low	Low
Rhode Island	Low	Low	Low	Low	Low
South Carolina	Low	Low	Specified ^{2,12,14,15,16}	Specified ¹⁷	Low
South Dakota	Low	Low	Specified ¹³	Low	Low
Tennessee	Low	Low	Specified ^{2,8,14,15}	Low	Low
Texas	Low	Low	Specified ^{10,14,16}	Specified ¹⁷	Low
Utah	Low	Low	Specified ¹³	Low	Low
Vermont	Low	Low	Low	Low	Low
Virginia	Low	Low	Specified ^{2,14,15}	Specified ¹⁷	Low
Washington	Low	Low	Specified ¹³	Specified ¹⁷	Low
West Virginia	Low	Low	Specified ^{2,14,15}	Specified ¹⁷	Low
Wisconsin	Low	Low	Low	Low	Low
Wyoming	Low	Low	Specified ¹³	Low	Low

* Footnotes related to Specified Risks above are cross referenced to the individual values noted below (e.g., footnote ¹ relates to the Cape Fear Arch CBA).



US National Risk Assessment Risk Designation, by Risk Value

The following summary is taken from the US NRA and presented in the table above for clarity. A detailed breakdown by state and county vs. High Conservation Value (HCV) is available in Excel and is based on the information provide by FSC US.

Finally, for ease of representation a summary map has been created and presented at the end of this report.

HCV 1 – Species Diversity

Critical Biodiversity Areas (CBA)

1. Cape Fear Arch
2. Central Appalachians
3. Central California
4. Central Florida
5. Florida Panhandle
6. Klamath-Siskiyou
7. Southern Appalachians

Rare, Threatened, Endangered Species

8. Cheoah Bald Salamander
9. Dusky Gopher Frog
10. Houston Toad
11. Lesser Slender Salamander
12. Patch-nosed Salamander

HCV 3 – Rare Ecosystems

13. Old Growth Forest

Priority Forest Type:

14. Late Successional Bottomland Hardwoods
15. Mesophytic Cove Sites
16. Native Longleaf Pine Systems

Conversion

17. Specific counties as indicted by FSC US.
Refer to Excel summary.



Control Measures

For the fiber sourced from the areas with Specified Risk, summarized in Table 1 above, Control Measures (CM) have been implemented, as described below.

Controlled Wood (CW) Category 3 – High Conservation Values (HCV)

Consistent with the US NRA (pg. 152) implementation of CM 3.1 is Mandatory. CM 3.1 consists of two parts (both Mandatory), 3.1 a) CW Regional Meetings, and 3.1 b) implementation of Mitigation Options.

FSC US CW Regional Meetings

Consistent with CM option 3.1 a) i) Zimmfor attended and actively participated in all three of the FSC US CW Regional Meetings held in 2018 (refer to attendance lists), on behalf of applicable clients.

Mitigation Options

Consistent with CM 3.1 b) Zimmfor has developed Education and Outreach Materials to address the identified Specified Risks. The Education and Outreach Materials meet the prescribed requirements and are based on information prepared by FSC US and presented and discussed at the Regional Meetings, including input provided by subject matter experts.

These materials have been presented to suppliers at multiple levels:

- via weblinks sent directly from clients to suppliers;
- at in-person interviews with client suppliers and land managers (i.e., printed materials presented to sales personnel, loggers, forest managers and landowners); and
- to client procurement personnel (i.e., staff training) who directly interface with suppliers up the supply chain, with a focus on log buyers.

Given that Zimmfor utilized the Mandatory CMs developed by FSC US, stakeholder consultation and expert engagement were not required.

Additional Mitigation Efforts

In addition to the Education and Outreach efforts described above, Zimmfor has also established a CW Field Verification Program. The Program is based on a sampling protocol that covers all applicable source areas with Specified Risks, as defined within the NRA.

The Program is focused on:

- reviewing the presence/absence of Specified Risk values in the source area (i.e., validation)
- collection of direct evidence and related information on forest management as it pertains to the Specified Risk element(s)
- presentation and review of Education and Outreach Materials to individuals in the supply chain
- promotion and documentation (where evident) of Best Management Practices related to Specified Risks

Field Verification Audits – Results

The Zimmfor CW Field Verification Program commenced August 2019. To date no non-conformances have been identified. Zimmfor maintains a summary report for all audits completed, consistent with the audit plan, which is reviewed annually during Internal Audits and is available for review during External Audits.



CW Category 4 – Conversion

Consistent with the US NRA (pg. 172) implementation of CM 4.1 or 4.2 is Mandatory. The Zimmfor DDS utilizes CM 4.2, which consists of two parts (both Mandatory), 4.1 a) CW Regional Meetings, and 4.1 b) implementation of Mitigation Options.

The implementation of the CMs for Conversion are identical to those described above for HCVs (combined process). Therefore, refer to the previous section for details.

Complaints and Contact Information

Complaints related to the DDS should be forwarded to the Zimmfor FSC Risk Assessment Manager at: FSC.DDS@zimmfor.com.

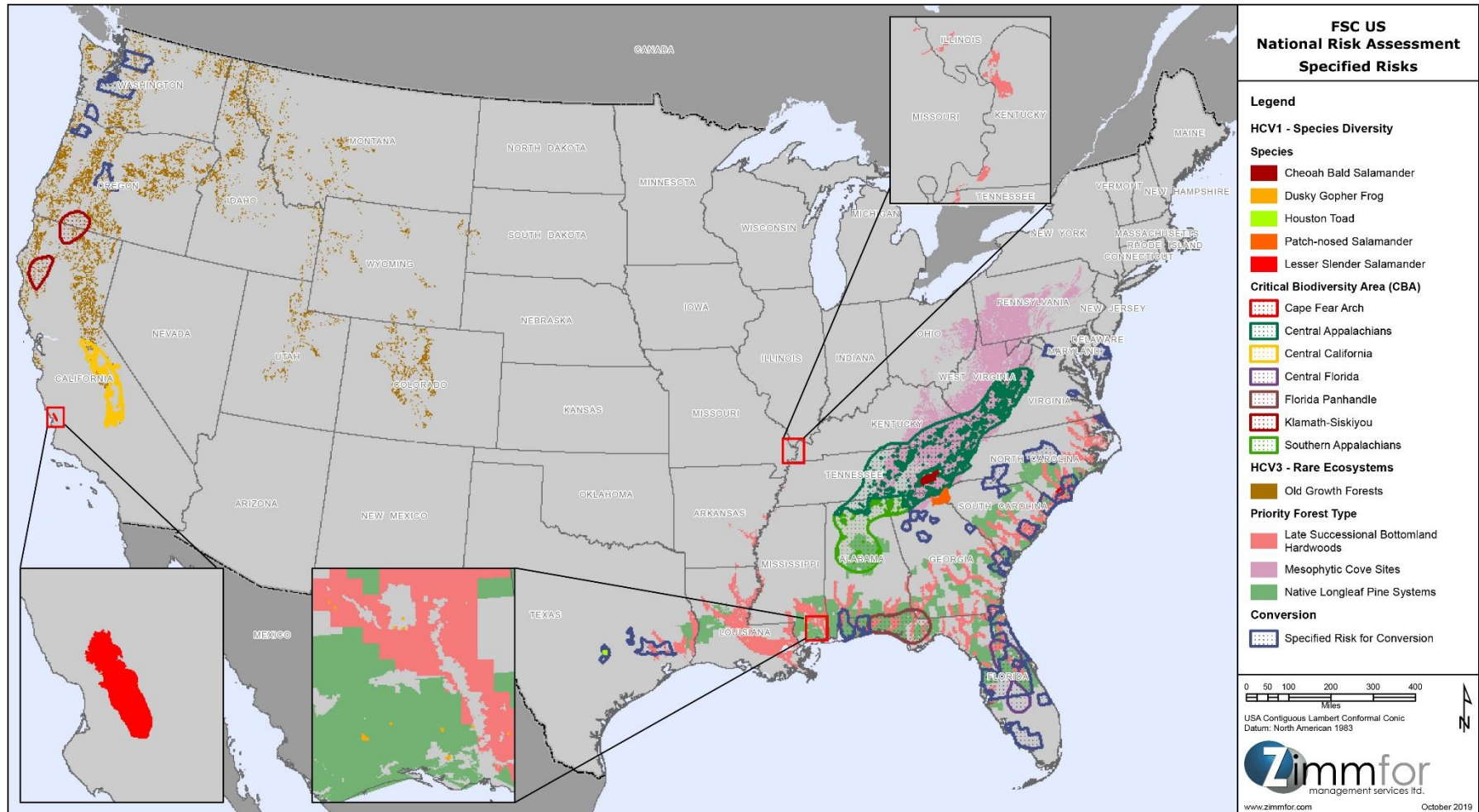
All complaints and comments received related to the Zimmfor DDS will be managed consistent with the FSC CW Standard (40-005 v3-1, section 7).

Complaints/comments must note the applicable client, state/province, FSC CW category and any applicable evidence to support the complaint/comment.

Complaints related to the FSC US National Risk Assessment should be forwarded to FSC US at info@us.fsc.org, or via the FSC US website at <https://us.fsc.org/en-us>.



FSC US NRA – Map of Specified Risks in the Lower 48 States





Appendix 1 – Participating Client List and Applicable Source Areas



Applicable Source Areas - USA

Participating Clients (Organizations)	AL	AZ	AR	CA	CO	CT	DE	FL	GA	ID	IL	IN	IA	KS	KY	LA	ME	MD	MA	MI	MN	MS	MO	MT	NE	NV	NH	NJ	NM	NY	NC	ND	OH	OK	OR	PA	RI	SC	SD	TN	TX	UT	VT	VA	WA	WV	WI	WY													
Arauco NA	Y		Y				Y		Y		Y	Y				Y	Y			Y			Y								Y		Y	Y	Y		Y							Y	Y	Y	Y														
Bakerview Forest Products										Y																																						Y													
Big Timber Hardwoods																																			Y															Y											
Boise Cascade				Y						Y														Y													Y											Y													
Bright Wood		Y		Y						Y														Y					Y																			Y				Y									
Cosmo Specialty Fibers																																																		Y											
Daiichi - CX Joy Hardwoods											Y	Y	Y		Y		Y			Y			Y				Y		Y	Y		Y											Y		Y	Y	Y														
Eldcan Forest Products																																																		Y											
Endura Products				Y						Y														Y																										Y											
JAF USA	Y											Y			Y			Y			Y		Y						Y	Y		Y												Y	Y			Y													
JAF - AB Skanditra											Y		Y																																								Y								
JELD-WEN USA		Y		Y					Y	Y		Y	Y			Y	Y			Y				Y					Y																			Y	Y	Y	Y										
Metrie Mfg	Y		Y	Y					Y	Y	Y	Y			Y					Y		Y	Y	Y					Y	Y		Y															Y	Y	Y	Y											
Murphy Co.				Y						Y			Y															Y			Y																				Y	Y	Y								
Harmac-Pacific																																																				Y									
Nippon Dynawave Packaging				Y	Y					Y														Y																										Y				Y							
Nippon Paper Lumber (NPL)																																																				Y									
NORPAC				Y	Y					Y														Y																												Y				Y					
Northwest Hardwoods	Y		Y	Y					Y	Y	Y	Y	Y		Y			Y			Y	Y	Y		Y					Y	Y	Y	Y	Y	Y	Y	Y									Y	Y	Y	Y												
Patrick Lumber	Y			Y					Y	Y						Y								Y																												Y	Y								
Plummer Forest Products									Y																																													Y							
PLS International	Y			Y					Y	Y						Y							Y		Y																												Y								
Port Townsend Group				Y	Y				Y	Y						Y								Y	Y																											Y				Y					
PotlatchDeltic			Y													Y																																							Y						
Rich-ply										Y																																												Y							
Robbins, Inc.																				Y																																			Y						
Sierra Pacific Industries			Y	Y						Y														Y																													Y								
Swiss Krono									Y																																																				
Tokushu Tokai Paper																																																						Y							
Trans-Pacific Trading										Y																																												Y							
Western Forest Products										Y																																											Y								
Wilson Forest Products																																																							Y			Y			