



Publicly Available FSC Controlled Wood Risk Assessment

(based on FSC-STD-40-005 V 2-1 Annex 2 and FSC-ADV-40-016 V1-1)

To be completed by client

Date of Risk Assessment: 10-29-08

Country and District of Origin: United States; International Veneer Co., Inc. (IVC) logs originate from the states of: AL,AR,CT,IA,IL,IN,KY,MA,MD,ME,MI,MN,MO,MS,NC,NH,NJ,NY,OH,PA,SC,TN,TX,VA,VT,WI,&WV.

To be completed by SCS

Date Approved: 12/15/08

List your sources of information below.

1. Illegally Harvested Wood The district of origin may be considered low risk in relation to illegal harvesting when <u>all</u> the following indicators related to forest governance are present:	Findings	Resulting Level of Risk
1.1 Evidence of enforcement of logging related laws in the district.	The United States has strong enforcement of regulating logging laws against timber trespass and timber theft.(1)	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.	"Timber harvesters are registered or certified and receive their accreditation primarily via educational programs."(1)pg. 52,57. Also, state lands are administered by state forestry officials that oversee compliance.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin.	Illegal harvesting does occur, however laws protect landowners from intentional and accidental theft.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade.	The United States also has industrial lands, which contain restricted access, control of logging activity, and numerous SFI certified lands all of which adds to protection.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
2. Wood harvested in violation of traditional or civil rights The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when <u>all</u> the following indicators are present:	Findings	Risk Level
2.1 There is no UN Security Council ban on timber exports	Correct, there is not a ban for the United States.	<input checked="" type="checkbox"/> Low Risk

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from the country concerned.		<input type="checkbox"/> Unspecified Risk
2.2 The country or district is not designated a source of conflict timber (E.g USAID Type 1 conflict timber).	The United States does not comply as a designated source of conflict timber.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned.	The United States has child labor laws in place to protect this from happening.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
2.4 There are recognized and equitable processes ⁵ in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned.	Laws are in place which cover this issue in the United States. A reservation system is in place to address tribal rights.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
2.5 There is evidence of no violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.	Correct, see: http://www.unhchr.ch/html/menu3/b/62.htm (2)	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
3. Wood harvested from forest in which high conservation values are threatened by management activities The district of origin may be considered low risk in relation to threat to high conservation values if: a) indicator 3.1 is met; <u>or</u> b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1.	Findings	Risk Level
3.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten ecoregionally significant high conservation values. OR		<input type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.	IVC does not procure logs in ecoregions which are in danger or biodiversity hotspots. "For example, wood harvested within the Appalachian-Blue Ridge Forest Ecoregion (WWF designation as a Global 200 ecoregion) is low risk due to existing US legal structures, harvest practices, public land ownership, and protection."(3) pg. 8 The US has never formally adopted a national forest	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk

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	<p>policy, however, several environmental laws and governing agencies have a direct or indirect influence on forest practices. The federal government administers incentive based programs to encourage sound forest practices in the IVC procurement area.</p> <p>Management protection is in place for several hundred species including the Eastern Cougar (<i>Puma concolor</i> cougar) and Red Wolf (<i>Canis lupus rufus</i>) which are located within the area.</p> <p>The FSC certification of state lands in Pennsylvania, Indiana, New York and Wisconsin demonstrates the protection of their own lands.</p> <p>Provisions of the federal laws that affect forest management are periodically reviewed by US Congress. State and private organizations help in the protection of HCV areas within the area.(1)</p>	
<p>4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses</p> <p>The district of origin may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicator is present:</p> <p>[Note: the change from plantations to other land uses is not considered as conversion].</p>	<p>Findings</p>	<p>Risk Level</p>
<p>4.1 There is no net loss AND no significant rate of loss (> 0.5% per year) of natural forests and other naturally wooded ecosystems such as savannahs taking place in the eco-region in question.</p>	<p>"FAO statistics show that the extent of forest and other wooded land increased in the US between 1990 and 2000 by 365,000 ha/yr and between 2000 and 2005 by 159,000 ha/yr. Thus, the area of forest has experienced a positive change of 0.1%." pg. 161 (1)</p>	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk</p>
<p>5. Wood from forests in which genetically modified trees are planted</p> <p>5. The district of origin may be considered low risk in</p>	<p>Findings</p>	<p>Risk Level</p>



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relation to wood from genetically modified trees when one of the following indicators is complied with:		
a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned. OR	There are no genetically modified hardwood trees used in our procurement region for our use. Most genetic modification is for softwood and hardwood paper fibers.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use. OR		<input type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
c) It is forbidden to use genetically modified trees commercially in the country concerned.		<input type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk

Sources of information:

- (1) Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports; July 7, 2008, Alberto Goetzi
- (2) <http://www.unhchr.ch/html/menu3/b/62.htm>
- (3) FSC-US Guidance Avoiding Wood from HCVEs - Draft for Public Comment; Gary Dodge & Phil Guillery