

Does Emporium Hardwoods, LLC meet FSC's Controlled Wood standard? October 5th, 2023

We are carrying out an audit of Emporium Hardwoods, LLC located in Pennsylvania, USA to see if their operations comply with FSC's [Controlled Wood](#) standard (FSC-STD-40-005 V3-1). We are writing to you to ask if you know of any reason why their operations would not meet this standard.

Controlled Wood is wood that meets minimum requirements and that can therefore be mixed with FSC wood and used in products with an FSC Mix label. In particular, the wood must not be:

- harvested illegally.
- harvested in violation of traditional and civil rights.
- harvested from forests with a high conservation value that is threatened by management activities.
- harvested from forests being converted to plantations or non-forest use.
- from forests in which genetically modified trees are planted.

We will carry out our audit on November 9th, 2023. Here is how you should comment, if you wish to do so:

- When? You should send comments to us before or during the audit.
- How? You can comment by:
 - Meeting with a Preferred by Nature staff member in person.
 - Phone to Andreeanne Meley, Preferred by Nature staff member from the United States. Her phone number is 919-621-0167.
 - Writing to Andreeanne Meley at 13 Jolina Court, PO Box 99 – Richmond, VT 05477
 - Email to Andreeanne Meley at ameley@preferredbynature.org
 - In person by arranging to meet with Andreeanne Meley
- If you want your comments to be confidential please notify us when you submit the comments.

If you provide comments, we will provide feedback to you within 30 days of the audit.

Emporium Hardwoods, LLC has written a summary document that lists:

- the risks they have identified that they may source unacceptable wood
- the measures they implement to mitigate those risks.

We have attached this summary document to this letter.


If you wish to dispute any aspect of this forest certification process or the decision we reach as to whether this company meets the Controlled Wood standard, you can access our Dispute Resolution Policy at <https://preferredbynature.org/dispute-resolution-policy>

Thank you for any help you are able to provide.

If you have any recommendations for contacting other stakeholders that may have an interest in providing comments on this company and audit, we would also gladly receive these from you.

Yours sincerely,

Andreeanne Meley

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	Document Owner: William Johns	Document # EH-DP-03	Last Revised: 6/1/2023

Controlled Wood/Due Diligence Procedure Summary for Public Distribution (first 4 pages only) Emporium Hardwoods Operating Company LLC

Notes:

1. **This document is effective October 5, 2019**
2. According to FSC STD-40-005 V3.1, Section 6 Publically available information, 6.1: “The organization shall provide a written summary of its DDS to the certification body. The written summary shall include the following information:
 - a) A description of the supply area(s) and respective risk designation(s);
 - b) Reference to the applicable FSC risk assessment;
 - c) The organization’s own risk assessment (excluding confidential information);
 - d) The procedure for filing complaints; and
 - e) Contact information of the person or position responsible for addressing complaints.”
This information will be included in the public summary of the certification report placed on the FSC database by the FSC Certification Body.


Program Scope

Emporium Hardwoods is implementing this Controlled Wood/Due Diligence Procedure to achieve conformance with the Forest Stewardship Council® (FSC®) Standard for Company Evaluation of Controlled Wood in order to avoid material from unacceptable sources. This procedure is part of a single-site Chain of Custody and Controlled Wood Program covering the Emporium Hardwoods’ manufacturing facility in Emporium, Pennsylvania.

The wood suppliers are categorized according to the following:

- a) Suppliers that supply FSC Certified wood with required documentation;
- b) Companies that supply FSC Certified Controlled Wood (currently there are none);
- c) Uncertified “controlled material” (wood) purchased directly from forest owners and harvested under the direction of Emporium Hardwoods foresters;
- d) Wood from suppliers that harvest “controlled material” directly from the forest and bring that wood directly to Emporium Hardwoods’ mills; and
- e) Wood sourced indirectly through sawmills, wood dealers, concentration yards or other systems where “controlled material” inputs may have been processed or aggregated.
- f) Wood from suppliers that the FSC committee cannot verify as “controlled material” will be segregated.

Types c, d and e are included in Emporium Hardwoods’ controlled wood verification program.

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Supply Area

All non-FSC certified wood for Emporium Hardwoods manufacturing facility is sourced from within the U.S. This wood currently originates from Pennsylvania, New York, Ohio, West Virginia, Virginia, Maryland and Connecticut, Massachusetts, Rhode Island, Illinois, Kentucky, Missouri, Arkansas, Michigan, Indiana, and New Hampshire.

Emporium Hardwoods has identified all of its wood suppliers and their incoming material as coming from either “Certified” or “controlled material” sources. The Division Forester has provided its suppliers the company’s procurement policies consistent with the controlled wood requirements and monitors the practices to determine conformance.

FSC Risk Assessment and Risk Designations

Emporium Hardwoods relies on the FSC U.S. Controlled Wood National Risk Assessment (NRA) to assess the five unacceptable sources of wood:

1. Wood harvested illegally.
2. Wood harvested in violation of traditional and civil rights.
3. Wood harvested from forests with a high conservation value that is threatened by management activities.
4. Wood harvested from forests being converted to plantations or non-forest use.
5. Wood from forests in which genetically modified trees are planted.

The NRA found “low risk” for FSC Categories 1, 2, and 5 for all forested portions of the conterminous 48 states. There are three mapped areas of specified risk that overlap the Emporium Hardwoods’ supply area. These are in two different categories, high conservation values, and forest conversion:


Category 3- High Conservation Values

- Central Appalachian Critical Biodiversity Area
- Mesophytic Cove Sites

Category 4 - Forest Conversion

For Specified Risks Associated with Category 3 High Conservation Values Emporium Hardwoods has implemented the mandatory Control Measures and has selected the mitigation options listed below. This Mitigation Option is being applied to Mesophytic Cove sites in the Appalachian region. Information from The Forest Steward Guild is supplied to all suppliers for educational purposes.

Specified Risk	Mitigation Option
Central Appalachian Critical Biodiversity Area (CBA)	Central Appalachian Forests: Educational & Outreach Materials: The Forest Steward Guild. Resources: youtube.com webinars.

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Mesophytic Cove Sites in the Appalachian region	<i>Central Theme - Education & Outreach:</i> Support for the Forest Steward Guild Mr. Alexander Evans PhD Executive Director Forest Steward Guild and had been the Guild’s research director for 11 years prior to becoming the Executive Director. Dr. Evans has a PhD from Yale School of Forestry and Environmental Studies. Ms. Dakota Wagner Southeast Region Coordinator Forest Steward. Ms. Wagner’s responsibilities include project management for projects focused on forest restoration in the Southeast. She hold a B.S. in Ecological Forestry from Warren Wilson College.
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There is no risk for conversion wood. The company does not source wood from any specified risk counties, and its DDS is used to prevent conversion wood from being provided by suppliers.

A member of the Emporium FSC committee reviews the notes from the FSC US Controlled Wood Meetings and then gives a summary at the committee meetings to keep the committee up to date on any changes.

Emporium Hardwoods Risk Assessment


Emporium Hardwoods’ FSC risk assessment for risk of sourcing was phased out on October 5, 2019. Emporium Hardwoods determined that there is “no risk” of mixing within its supply chains.

Procedure for Filing Complaints, Including Contact Person

Complaints regarding the Emporium Hardwoods Due Diligence System and/or Risk Assessment should be directed to Emporium Hardwoods’ Management Representative:

Emporium Hardwoods Management Representative

William Johns, Division Forester
Emporium Hardwoods Operating Company LLC
15970 Route 120
Emporium, PA 15834
814-486-3764
Fax: 814-486-3392

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Complaints must be in writing and sent by email. Emporium Hardwoods will acknowledge the complaint as soon as practical, and will provide an initial response to the complaint within two weeks.

Emporium Hardwoods will assess each complaint and determine whether it is substantial. If so Emporium Hardwoods will attempt to resolve the complaint directly with the person or organization that filed it. If the complaint can't be resolved this way then Emporium Hardwoods will notify the FSC US National Office and the certification body and move to verification. Emporium Hardwoods will conduct field or office verification within two months.


Any complaints regarding the FSC Risk Assessments or which are determined to be substantial will be forwarded to the appropriate FSC office. While such substantial complaints are pending the precautionary principle will be employed with respect to the continued sourcing of the relevant material, and this approach will be communicated.

If the results of verification show that control measures are needed these will be implemented by the supplier and verified before any affected material is included in the controlled wood program.

Emporium Hardwoods will inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution.

Emporium Hardwoods' Management Representative is responsible for maintaining copies of relevant correspondence; and recording and filing all complaints received and actions taken.

End of Summary of DDS for Public Distribution.
The remaining portions of this document (EH-DP-03) are confidential.

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addressing risk of sourcing, that all wood material inputs from its supply area and "supply chains" have no risk of mixing and that the two areas of specified risk have been mitigated. All incoming wood material is further controlled through documentation of the source of the wood and through formal "Contracts" from all of the suppliers that they will not knowingly supply any uncontrolled/controversial wood material. Most inputs are considered "controlled material" unless they are also considered "certified forest content" per the respective standards.