

Does Townsend Lumber Inc. meet FSC's Controlled Wood standard?

November 29, 2023

We are carrying out an audit of Townsend Lumber Inc. located in Tillsonburg, Ontario, Canada 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 in mid-January 2024. 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 James Hallworth at (249) 358-9844
Writing to James Hallworth at
P.O. Box 1771
Chelsea, QC J9B 1A1
Canada.
 - Email to James Hallworth at jhallworth@preferredbynature.org
 - In person by arranging to meet with James Hallworth
- 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.

Townsend Lumber Inc. 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,



Mélanie Proulx
Operations Specialist

Appendix A: Description of the Due Diligence System, including information provided by the organisation according to FSC-STD-40-005 V3-1, Section 6

1. General information

Organisation name:	TOWNSEND LUMBER INC
FSC certificate code:	FSC-C120103, NC-CW-006807
Organisation's DDS contact person:	HEATHER ELLIOTT – FSC PROGRAM COORDINATOR
DDS prepared/assisted by:	<i>DDS prepared by the organization</i>
Date last reviewed/updated (by the organisation):	April 2023

2. Suppliers

Participating site	Non-certified material type sourced	Exact number of suppliers	Supplier type(s)	Average no. of tiers in the supply chains	Approximate or exact number of sub-suppliers
<i>Townsend Lumber Inc.</i>	<i>Logs</i>	<i>54</i>	<i>Logger (contracted to source logs from the forest of origin- private woodlots)</i>	<i>One</i>	<i>0</i>

3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
Southern Great Lakes Forest	1.1-1.21	NRA V.2-1	Low Risk
	2.1	NRA V.2-1	Low Risk
Eastern Great Lake lowland forest	2.2	NRA V.2-1	Low Risk
	2.3	NRA V.2-1	Specified Risk
	3.0	NRA V.2-1	Low Risk
	3.1	NRA V.2-1	Specified Risk
	3.4-3.6	NRA V.2-1	Low Risk
	4	NRA V.2-1	Low risk
	5	NRA V.2-1	Low risk
	6	NRA V.2-1	Low Risk

4. Risk assessment

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2.3- The rights of Indigenous and Traditional Peoples are upheld.

Control Measure: Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan.

2.3- Rights of Indigenous and Traditional peoples are withheld by checking news websites like: [CBC News | Indigenous](#) , [Home - The Turtle Island News](#), [In The News - Congress of Aboriginal Peoples | Congrès des peuples autochtones \(abo-peoples.org\)](#) Logging staff are aware and educated on proper Ingenious practices regarding forestry for example Reserves are run by a "Band " which is a committee of members who vote and decide on matters involving the Reserve.

INDICATOR

3.1- Wood from forests where high conservation values are threatened by management activities

Control Measure: For all species on private Small & Low Intensity Managed Forests (SLIMFs): Evidence demonstrates that owners and/or managers of privately-owned forests are informed about: • the critical habitats* of species within their managed forests; AND • the threats to the critical habitat*; AND • best management practices to reduce threats to critical habitat*; AND • applicable legislation.

3.1 Townsend Lumber will notify owners/mangers of privately owned forests about: the critical habitats of species within their managed forests, the threats to the critical habitat, best management practices to reduce threats to critical habitat. We will provide several online resources where they can find more information. Lastly, we will refer and abide by applicable legislation and bylaws enforced in said areas. See "Timber Sale Agreement" for example of what is presented to each land owner.

4.b Risk assessment and mitigation for mixing in the supply chain

Participating site	Supply chain type	No. of tiers	Risk of mixing	Control measures	Findings from field verification if undertaken as a control measure
<i>Townsend Lumber Inc.</i>	<i>Wood purchased on behalf of the organization by a contracted logger and delivered by the organization directly from forest of origin to organisations log yard.</i>	<i>1 tier</i>	<i>No risk of mixing as wood is purchased from forest of origin and delivered to the organization.</i>	<i>N/A</i>	<i>N/A</i>

5. Technical experts used in the development of control measures

N/A, technical experts were not required

6. Stakeholder consultation processes

N/A, stakeholder consultation not required

7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact Heather Elliott FSC program coordinator, 1250 Jackson Sideroad, Tillsonburg, ON, N4G 4G7, Canada, helliot@townsendlumber.com, (519)842-8234. We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

Organizations complaint's procedure:

Should any personnel either inside or outside the company identify a concern with the company's application or utilization of FSC Controlled materials the company shall:

- Formally acknowledge the receipt of the complaint through written notice to the applicable managers
- Inform all relevant stakeholders of the receipt of the complaint and document the planned response by the company within 2 weeks.
- Forward complaints related to risk designations in the relevant FSC Risk assessment to the responsible body
- Conduct a preliminary assessment to determine whether evidence provided in the aforementioned complaint is or is not substantial through evaluation of evidence provided against the risk of using materials from unacceptable sources
- Communicate with complainants that aims with aims to solve the aforementioned complaint if assessed as substantial before further actions are taken
- Take a precautionary approach towards the continued sourcing of the relevant material while complaint is pending
- Forward any substantial complaints to the certification body and relevant FSC National Office for the supply area of receipt of the complaint including information on the steps to be taken by the company to resolve the complaint as well as any precautions implemented.
- Increase controlled wood verification standards while the complaint file is open. Increases in verifications standards shall be documented and forwarded to the auditing body.
- Complete an in-depth investigation as to the source of the complaint within 2 months of receipt to determine the corrective actions required to correct the complaint. Should corrective action not be feasible, the material in question shall be segregated and excluded according to the FSC uncontrolled wood procedures listed above.
- Determine what corrective action is to be taken and verify the corrective action has been implemented and to whether it has been effective
- Exclude the relevant material and suppliers from the organizations supply chain if no corrective action has been taken
- Inform the complainant, the certifying body, and the relevant FSC National office of the results of the complaint and any actions taken towards its resolution, and for maintaining copies of relevant correspondence
- Recording and filing all complaints received and actions taken