

Does MacDonald & Owen Veneer & Lumber Co. meet FSC's Controlled Wood standard?

July 16, 2021

We are carrying out an audit of Tri-State Hardwoods Ltd. located in Accord, New York, United States 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 August 30-31, 2021. 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 .
 - Phone to Angus McAuslan, Preferred by Nature staff member from North America's regional office. His phone number is: +1 416-882-5576
 - Writing to Angus McAuslan at:
P.O. Box 1771
Chelsea, QC J9B 1A1
Canada
 - Email to Angus McAuslan at amcauslan@preferredbynature.org
 - In person by arranging to meet with Andreanne Meley or Alicia Raimondi
- 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.

Tri-State Hardwoods Ltd. 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 www.preferredbynature.org.

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,

Angus McAuslan
Specialist, Supply Chains

FSC Controlled Wood Due Diligence Summary

TRI-STATE HARDWOODS, LTD. in ACCORD, NEW YORK, ULSTER COUNTY, USA

Prepared by Anna Peck, July 15, 2021

1. Due Diligence System information:

Description of Supply Area	Risk Designation	Indicator(s) for Supply Area Specified Risk Designation	Risk Assessment
MAINE	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
MARYLAND	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
NEW HAMSHIRE	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
	LOW RISK	Mesophytic	
WISCONSIN			FSC-NRA-USA v.1-0
OHIO	SPECIFIED RISK	Mesophytic	FSC-NRA-USA v.2-0
PENNSYLVANIA	SPECIFIED RISK	Mesophytic	FSC-NRA-USA v.2-0
VERMONT	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
CONNETICUT	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
NEW JERSEY	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
DELAWARE: Except Sussex County	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
MINNESOTA	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
MASSACHUSETS	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0
NEW YORK	LOW RISK	Mesophytic	FSC-NRA-USA v.1-0

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Controlled Products

*Ex. IFLs, Woodland
Caribou, Blanding's Turtle*

2. Complaints

Procedure for filing complaints

Stakeholder Input and Complaints

Our stakeholder procedure (7.1) consists of the following steps (7.2), and will be completed within two weeks of receiving the initial complaint:

1. We will acknowledge receipt of the complaint via email whenever possible. When an email address is not provided (or is refused upon request) by the complainant, we will send a written acknowledgement via US mail. (7.2.a)
 - a. Anonymous complaints, or complaints where a mailing address or email address are not provided, will be considered invalid and will not be acknowledged.
2. Our initial acknowledgement will include the complaint procedure as outlined in our Due Diligence System Public Summary. (7.2.b)
3. We will conduct a preliminary assessment to determine the substance of any comment or complaint. Complaints will be defined as “substantial” or “not substantial”.
 - a. This assessment will include, but not be limited to, the breadth and/or specificity of the complaint, and the standing of the complainant. (7.2.d)
 - i. Lack of specificity and standing will automatically be considered “not substantial”
 - ii. Complaints not related to our risk assessment or supply area will automatically be considered “not substantial”
 - iii. High specificity and standing complainants, with complaints that are related to our risk assessment or supply area, will be reviewed on a case-by-case basis for substance.

We will forward complaints related to risk designations in the relevant FSC risk assessment to the identified responsible bodies that must be notified by such complaints (7.2.c), Our Due Diligence Compliance Officer will be responsible for overseeing the response to any complaint.

“Not Substantial” Complaints

For complaints determined “not substantial”, notification of the findings and resolution of the complaint will be sent to our Certification Body, the complainant, and FSC-US. (7.2.l)

“Substantial” Complaints

Complaints that are determined to be substantial will trigger a dialogue between our organization and the complainant with the goal of reaching a satisfactory resolution for all sides. This process will be overseen by our Due Diligence Officer. (7.2.e)

Complaints that are determined to be substantial will be sent via email to our Certification Body and FSC national office contact persons (7.2.f). This notification will include:

- Information suitable to accurately define the complainant and complaint
- Steps taken to date by our organization to respond to the complaint
- Clear definition of how steps taken to date incorporate a 'precautionary approach' to the complaint concerns. (7.2.g)

When a "substantial" complaint is determined, the following actions will be taken within two months of receipt of the complaint:

- A formal verification of the issue will be implemented and recorded by our Due Diligence Officer, or his/her designee. (7.2.h)
 - This verification will include explicit steps to mitigate the conditions of the complaint, or a determination of exclusion for the supplier or area affected by the complaint will be made. (7.2.i)
- Proof of the implementation of the determined steps, or system of exclusion, will be provided and recorded (7.2.j-k)
- Notification of the findings and results of substantial complaints, and the resolution and verification of the complaint will be sent to our Certification Body, the complainant, and FSC-US. (7.2.l)

Supporting Documents

- Initial Complaint Assessment form
- Substantial Complaint Resolution form

Contact information of the person or position responsible for addressing complaints

Anna Peck

845-687-7814

anna@tristatehardwoodsltd.com

3. 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

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
Wood harvested from forests in which high conservation values are threatened by management activities	Providing Educational Materials to Vendors Reviewing the Controlled Wood Regional Reports The information packages prepared by EcoForesters as well as consulting firms (American Green Consulting, MixedWood). EcoForesters is an organization that demonstrates sufficient expertise in the subject matter as defined by FSC-STD-40-005. This entity has academic, forestry, and invasive species experts on staff that work in the specific sourcing area where the organization sources its controlled material from specified risk MCS (see EcoForester’s website https://www.ecoforesters.org/about-us/meet-the-team/).

Assessment Indicator Requiring Control Measure(s)	Control Measures for Addressing Risk of Supply Chain Mixing of Unacceptable or Non-eligible Sources
	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 utilized 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. Because of this, no actions tied to CH developed control measures are required.

