

## Does Finch Paper LLC meet FSC's Controlled Wood standard? January 25, 2023

We are carrying out an audit of Finch Paper LLC located in New York, USA to see if their operations comply with FSC's <u>Controlled Wood</u> 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 March 21st. 2023. if you wish to do so:

Here is how you should comment,

- 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 Mark Graveel from the Preferred by Nature North American Office. His phone number is (615) 457-9379
    - Writing to Mark Graveel at NEPCon LLC 13 Jolina CT, PO BOX 99 Richmond, VT 05477.
    - Email Mark Graveel at mgraveel@preferredbynature.org
    - In person by arranging to meet with Mark Graveel
  - 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.

Finch Paper 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 <a href="https://preferredbynature.org/dispute-resolution-policy">https://preferredbynature.org/dispute-resolution-policy</a>

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 Preferred by Nature – US/ Canada

Preferred by Nature<sup>TM</sup>



# FSC Controlled Wood Due Diligence System Public Summary

### 1. General information

Organisation name:	Finch Paper LLC
FSC certificate code:	NC-CW-000934
Organisation's DDS contact person:	Benjamin Povak
DDS prepared/assisted by:	Benjamin Povak
Date last reviewed/updated (by the organisation):	January 31, 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
Finch Paper LLC 1 Glen Street Glens Falls, NY 12804	<ul> <li>Controlled Wood 8-foot Pulpwood</li> <li>Controlled Wood Paper Chips</li> </ul>	187 Controlled Wood Suppliers	Supplier Types include: 1. Forest Management Enterprise 2. Primary Producer 3. Secondary Producer (Sub Supplier)	The supply chain consists of 4 tiers.	The exact number of sub suppliers is 355.

3. Supply areas

	Controlled		
Supply area	wood	Reference to risk assessment used	Risk designation
	category		
Contiguous State of New York, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Roundwood Pulpwood	3	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of Vermont, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Roundwood Pulpwood	3	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of New Hampshire, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Roundwood Pulpwood	3	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of Massachusetts, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Roundwood Pulpwood	3	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of Connecticut, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Roundwood Pulpwood	3	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of Maine, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
(Adjacent to Maine/New Hampshire Border)	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
<ul> <li>Controlled Wood Roundwood Pulpwood</li> <li>Controlled Wood Paper Chips</li> </ul>	4	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of Rhode Island, USA (Northeastern Region)	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Roundwood Pulpwood	3	FSC-NRA-USA V 1-0	Low risk
Controlled Wood Paper Chips	4	FSC-NRA-USA V 1-0	Low risk
(Identified as possible sourcing area through plausibility analysis. No controlled	5	FSC-NRA-USA V 1-0	Low risk
wood purchased from this area)			

Supply Area	Controlled	Reference to Risk Assessment	Risk Designation
Quebec, Canada	Wood		
	Category		
	1	FSC-NRA-CA-V2-1	Low Risk
	2	FSC-NRA-CA-V2-1	Specified Risk
	3	FSC-NRA-CA-V2-1	Specified Risk
	4	FSC-NRA-CA-V2-1	Specified Risk
	5	FSC-NRA-CA-V2-1	Low Risk
Contiguous State of Pennsylvania, USA (Appalachian Region)			
Controlled Wood Roundwood Pulpwood			
Controlled Wood Paper Chips			
	1	FSC-NRA-CA-V2-1	Low Risk
	2	FSC-NRA-CA-V2-1	Low Risk
	3	FSC-NRA-CA-V2-1	Specified Risk
	4	FSC-NRA-CA-V2-1	Low Risk
	5	FSC-NRA-CA-V2-1	Low Risk

#### 4. Risk assessment and mitigation

#### 4.a Risk mitigation for the origin of the material

- Control Measures:
  - Indicator 2.3, (Applicable in Canada only)- Control Measure #1- First Nations with legal and/or customary rights within the supply area do not object to the forestry plan. No evidence of opposition related to forest management was found.
  - Indicator 3.1, (Applicable in Canada only), HCV 1
    - Eastern Great lakes Lowland Forests:
      - American ginseng (*Panax quinquefolius*)
        - Control Measure #1- Demonstration that harvesting does not take place in critical habitats for this species.
        - Control Measure #4- For private Small and Low Intensity Managed Forests (SLIMFs), evidence demonstrates that owners and/or managers of privately-owned forests are informed about:
          - a. The species description; AND
          - b. The critical habitat of species within their managed forests; AND
          - c. Best management practices to reduce threats to critical habitat; AND
          - d. Applicable legislation
      - Wood turtle (*Gluptemys insculpta*)

- Control Measure #1- Demonstration that harvesting does not take place in critical habitats for this species.
- Control Measure #4- For SLIMFs, evidence demonstrates that owners/managers of privately-owned forests are informed about:
  - a. The species description; AND
  - b. The critical habitat of species within their managed forests; AND
  - c. The threats to the critical habitat; AND
  - d. Best management practices to reduce threats to critical habitat; AND
  - e. Applicable legislation

This information is provided to landowners and/or managers of privately owned forests in the form of an information package containing the required information as described above.

- New England Acadian Forest
  - Lake Utopia Rainbow Smelt (Osmerus mordax)
    - Control Measure #1- Critical habitat for this species is outside the procurement area of the Certificate Holder, since critical habitat is located in the Providence of New Brunswick.
  - Furbish's Louseworth (Pedicularis furbishiae)
    - Control Measure #1- Harvesting does not take place in critical habitat. Critical habitat for this species is located in the Providence of New Brunswick.
  - o Blanding's turtle (Emydoidea blandingii)
    - Control Measure #1- Critical habitat for this species is outside of the procurement area of the Certificate Holder. There are
      no procurement activities within critical habitat (Nova Scotia). Harvesting does not take place in the identified critical
      habitat.
  - Van Brunt's Jacob's-Ladder (*Polemonium vanbruntiae*)
    - Control Measure #1- Ensuring that harvesting does not take place in critical habitats. In Quebéc, the Société de conservation des milieu humides du Quebéc has established nature preserves on private property to protect areas of occurrence.
    - Control Measure #4- Considering that a known site of Van Brunt's Jacob's-Ladder, information was provided to Quebec's primary wood producer. This information contains the following:
      - a. The critical habitat of the species; AND
      - b. The threats to the critical habitat; AND
      - c. Best management practices to reduce threats to critical habitat; AND
      - d. Applicable legislation

This information is provided to landowners and/or managers of privately owned forests in the form of an information package containing the required information as described above.

- Indicator 3.1 (Applicable to US only, Contiguous State of Pennsylvania), HCV 3
  - Mesophytic Cove Sites
    - Control Measure 3.1.b.Implementation of one or more of the actions identified during the collaborative dialogue at the Controlled Wood Regional Meetings, as detailed in the Controlled Wood Regional Meeting Report.
      - Education and Outreach (per "Guidance for Mitigation Options"), Central Theme, Education & Outreach
        - Using materials as specified in individual mitigation options, communicate to audiences the conservation values of the HCV, threats from incompatible forest management, and opportunities for conservation through management that enhances the HCV and reduces or eliminates the threat. The desired outcome of these communications is engaging landowners, foresters, and loggers in the conservation of the HCV within the specified risk areas.
      - Staff Training
        - Ensure staff and contact foresters received training, with periodic refreshers.
- Indicator 4.1 (Applicable in Canada only)
  - Control Measure #1- Evidence demonstrates that supplied material does not originate from areas converted to non-forest.
  - Control Measure #2- Evidence demonstrates that supplied material originates from acceptable sources of conversion, including:
    - Conversion that results in conservation benefits (e.g. ecological restoration, species at risk).
    - Publically approved changes in zoning within urban areas.

#### 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
Finch Paper Woodyard- 1 Glen Street, Glens Falls, NY	<ul> <li>Pulpwood and Paper Chip Inputs: Pulpwood is purchased from approximately 187 individual Controlled Wood (CW) suppliers. Pulpwood and paper chip inputs consist of:</li> <li><u>Roundwood Pulpwood purchased</u> from an internationally recognized <u>Certification Body</u> such as FSC, SFI, PEFC, or American Tree Farm.</li> </ul>	CW purchasing (Roundwood and Chips) has 4 possible tiers: 1. Concession Holder 2. CW Supplier 3. CW Sub Supplier 4. Log Yard or Chip Plant	There is no risk of mixing of ineligible inputs into the CW fiber stream due to mitigation measures that are in place to within Finch's DDS. Daily audits of the sourcing information, feedback from impromptu interviews of CW Suppliers conducted by Finch wood procurement personnel, and	<ul> <li>Control Measures to mitigate the risk of mixing of ineligible inputs:</li> <li>For Inputs (Roundwood Pulpwood, Paper Chips, Kraft) <u>purchased from an internationally recognised</u> <u>Certification Body</u> such as FSC, SFI, PEFC, or American Tree Farm, risk is mitigated through the supplier's Chain of Custody Procedures.</li> </ul>	Field verification, combined with impromptu interviews with CW Suppliers, has found only minor instances of CW Supplier identification or material source location errors. In cases where discrepancies were noted, the discrepancies were either 1. Identified by the CW Supplier and noted on incoming
			regular field verification audits have not indicated a risk of		paperwork for correction (trip ticket left by supplier at mill

purchased from Tunch Lorest     entering the fiber stream.     operations: Risk is mitigated through barrest planning and administrative oversight. Oversight is doministrative oversight. Oversight is doministrative ov	٠	CW Roundwood Pulpwood	mixing of ineligible inputs	•	For CW inputs purchased from FFM	noted change in location), or 2.
US New York, Vernort Ently-       oversight: Oversight: administered by Finch Forest       Suppler: Non-anelighte inputs         Management. Timber harvest is administered by Finch Forest       and Finch Accounting staff Yores.       Suppler: Non-anelighte inputs         Implemented in each step from the Concession Holder Oxford       For Paper Chip Inputs-       Suppler: Non-anelighte inputs         Implemented in each step from the Concession Holder Clis Only Jone       For Paper Chip Inputs-       Suppler: Non-anelighte inputs         Concession Holder Clis Only Jone       Suppler: Suppler Suppler Suppler Suppler Suppler Is an explore to garden and the Suppler Suppler Is an explore to garden and the Suppler Suppler Is an explore to Generate US Suppler Is an explore to garden and the Suppler Suppler Is an explore to Generate US Suppler Is an explore to garden US Suppler Is an explore to garden US Suppler Is an explore to garden US Suppler Is an explore to Generate US Suppler Is an explore IS Suppler IS I		purchased from Finch Forest	entering the fiber stream.		operations- Risk is mitigated through	Errors were identified by Finch
Wood is purchased from the Concession Holder by Finch Forest Management. Timber harvest is administered by Finch Forest Management. Timber harvest is administered by Finch Forest Management foresters.       Supplier Namone-ligible inputs forests counting staff to ensure all process controls are implemented in each step from the forest to the mill.       Name been observed.         • <u>CWR Boundwood Pulpwood</u> purchased directly from the Concession Holder CW to Finch Mill Woodyard.       • <u>For Paper Chip Inputs</u> - Suppliers are required to sign a Vendor Agreements - CW Suppliers are required to sign a Vendor Agreement requiring chip suppliers to maintain records of CW Supplier anne, and material source location.       •         • <u>CWR Boundwood Pulpwood</u> purchased into Contracted Log Yards Urchased to Contracted Log Yards purchased from deliver wood, or CW Suppliers that purchased from deliver wood, or CW Suppliers that purchased from deliver wood form a concession Holder.       • <u>Self Declaration Form</u> Chip Supplier Identifies the sourcing area to the State and County Level through supply rehain analysis.       •         • <u>CWR Roundwood Pulpwood</u> purchased from deliver wood, or CW Suppliers that purchased from alcher non- Finch material inputs in the log yards. Contracted Log Yard. Wood is segregate from al lother non- Finch material inputs in the log yards. Contracted Log Yard. Wood is segregate from al cher non- Finch material inputs in the log yards. Contracted Log Yard. Supplier State prochased from inch there on Finch.       • <u>For CW inputs purchased from Contracted Log Yards. Sourcing material from other products not purchased by Finch.       •       <u>For CW inputs purchased from Contracted Log Yards. Sourcing material from other</u></u>		Management (FFM) operations (			harvest planning and administrative	personnel and rectified through
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CW Roundwood Pulpwood purchased into Contracted Log Yards US only-Contracted Log Yards purchase CW from a network of CW Suppliers. CW Suppliers are a combination of Concession Holders that harvest and deliver wood, or CW Suppliers that purchase, harvest, and deliver wood from a Concession Holder. Wood is delivered and piled in the Contracted Log Yard hauls wood to Finch Woodyard. CW Roundwood Pulpwood purchased by Finch from a CW Supplier from the Concession holder. Holder. CW Supplier Tor the Concession holder. Holder. Supplier hore to concession holder. Supplier hore to concession Holders that harvest and deliver wood to Finch Woodyard. Supplier hore to concession holder. Supplier hore to concession holder. Supplier hore to concession holder. Supplier hore to concession Holder to concession holder. Supplier hore to concession holder. Hore to concession holder. Supplier hore to concession holder. Hore to concession holder. Hore to concession holder. Supplier to the concession holder. Hore to concession holder. Hore to concession holder. Hore to concession holder. Hore		Woodyard.			requiring chip suppliers to	
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Yards (US only)- Contracted Log       material source location.         Yards purchase CW from a network       material source location.         of CW Suppliers. CW Suppliers are a combination of Concession       • Self-Declaration Form-Chip Supplier identifies the sourcing area to the State and County level through purchase, harvest, and deliver         wood, or CW Suppliers that purchase, harvest, and deliver       • and County level through supply chain analysis.         Wood is delivered and pile in the Contracted Log Yard. Wood is segregated from all other non-Finch material inputs in the log yard. Contracted Log Yard hauls wood to Finch Woodyard.       • For CW inputs purchased from Contracted Log Yard hauls wood to Finch Woodyard.         • CW Roundwood Pulpwood pulpwood pulpwood harvested, and delivered by the CW Supplier from the Concession holder.       • Sourcing Agreements: Contracted Log Yards sign a Vendor Agreement on Wood Supply Agreement, requiring suppliers to b	٠					
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purchase, harvest, and deliver       supply chain analysis.         wood from a Concession Holder.       • For CW inputs purchased from         Contracted Log Yard. Wood is       • For CW inputs purchased from         contracted Log Yard. Wood is       • Eor CW inputs purchased from         segregated from all other non-       • Eor CW inputs purchased from         Finch material inputs in the log       • Physical separation of         wood to Finch Woodyard.       • Physical separation of         • CW Roundwood Pulpwood       purchased by Finch from a CW         Supplier- CW is purchased,       • Sourcing Agreements-         harvested, and delivered by the       • Sourcing Agreement,         CW Supplier from the Concession       • a Vendor Agreement,         requiring suppliers to       • Wood Supply Agreement,						
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Contracted Log Yard. Wood is       Contracted Log Yards. Control         segregated from all other non-       Measures include:         Finch material inputs in the log       Physical separation of         yard. Contracted Log Yard hauls       Physical separation of         wood to Finch Woodyard.       Physical separation of         •       CW Roundwood Pulpwood         purchased by Finch from a CW       Finch.         Supplier- CW is purchased,       Finch.         harvested, and delivered by the       Contracted Log Yards sign         CW Supplier from the Concession       A Vendor Agreement,         holder.       Wood Supply Agreement,						
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wood to Finch Woodyard.       material from other products not purchased by Finch.         • <u>CW Roundwood Pulpwood</u> purchased by Finch from a CW Supplier- CW is purchased, harvested, and delivered by the CW Supplier from the Concession holder.       • <u>Sourcing Agreements-</u> Contracted Log Yards sign a Vendor Agreement or Wood Supply Agreement, requiring suppliers to						
<ul> <li><u>CW Roundwood Pulpwood</u> purchased by Finch from a CW <u>Supplier</u>- CW is purchased, harvested, and delivered by the CW Supplier from the Concession holder.</li> <li><u>Supplier</u> from the Concession holder.</li> </ul>		, .				
CW Roundwood Pulpwood     purchased by Finch from a CW     Supplier- CW is purchased,     harvested, and delivered by the     CW Supplier from the Concession     holder.     Finch.     Sourcing Agreements-     Contracted Log Yards sign     a Vendor Agreement or     Wood Supply Agreement,     requiring suppliers to		wood to Finch woodyard.				
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accurately report the CW						
					accurately report the CW	

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CW Roundwood Pulpwood	supplier name, Sub
purchased by Finch from a CW	Supplier, and material
Supplier and Sub Supplier (US	source location.
only)- CW is purchased from a Sub	
Supplier by the CW Supplier. Sub	<u>Suspension of ineligible</u>
Supplier purchases CW from the	inputs- If a source has
Concession Holder.	been deemed a potential
	ineligible input, the source
a Danar China nurshacad from Chin	in question will be
Paper Chips purchased from Chip	temporarily suspended.
Plants (US Only). Roundwood is	
supplied from Sub Suppliers to the	The source will be further
Chip Plant. Roundwood is	audited by the
purchased from the Concession	Procurement Manager to
Holder by the Sub Supplier, and is	determine the validity of
then sold to the Chip Plant. Chip	the claim. If the source is
Plant produces chips and sends to	deemed ineligible,
Mill Woodyard via truck. All Chip	material sourcing will
Plants maintain a list of Sub	terminate until the
Suppliers and relevant sourcing	problem can be rectified.
information, including Sub Supplier	
name, and harvest location (state,	For CW inputs purchased from
town).	Concession Holders, CW Suppliers
	and CW Sub Suppliers- Control
	measures include:
	incusares include.
	• <u>Sourcing Agreements</u> - CW
	Suppliers are required to
	sign a Vendor Agreement,
	requiring suppliers to
	accurately report the CW
	supplier name, Sub
	Supplier, and material
	source location.
	On site field verification-
	Finch wood procurement
	staff conduct regular,
	random field audits to
	verify the accuracy of the
	CW sourcing claim.
	Suspension of ineligible

			been deemed a potential
			ineligible input, the source
			in question will be
			temporarily suspended.
			The source will be further
			audited by the
			Procurement Manager to
			determine the validity of
			the claim. If the source is
			deemed ineligible,
			material sourcing will
			terminate until the
			problem can be rectified.
			Additional control measures for CW
			inputs purchased from Canada-
			Control measures include:
			<ul> <li>Purchase of wood from</li> </ul>
			inside the assessed
			procurement area- (South
			of St. Lawrence River,
			West of Ste Marie + Saint
			Georges. AND
			Purchase of wood from
			the Legislated Areas
			Professional Syndicate
			(timber marketing
			organization), OR
			<ul> <li>Purchase of wood from a</li> </ul>
			property managed by a
			forest engineer recognized
			by the "Ordre des
			ingenieurs forestiers du
			Quebec".
			<ul> <li>Annual audit of assessed</li> </ul>
			area to determine First
			Peoples objection to
			regional Forest
			management Plan to
			address Controlled Wood
			Category 2.1.
			Annual correspondence
			with stakeholders (wood
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	supply sources, consultants) to discuss dissemination of informational packets pertaining to specified risk areas in Controlled Wood Categories 3 and 4.
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#### 5. Technical experts used in the development of control measures

- Douglas Patterson, Renewable Strategies, Inc. assisted in control measures for Indicator 2.3. He has been an FSC CoC/CW auditor and consultant since 1999, is trained to ISO 9000 requirements, and currently manages a 160 company FSC Group CoC/CW certificates.
- Daniel Martin, Abies Consultants, assisted in control measures for indicators 2.3, 3.1, & 4.1.

#### 6. Stakeholder consultation processes

• N/A, stakeholder consultation not required

#### 7. Complaints procedure

- Complaints and disputes regarding the approved National Risk Assessment
  - If a dispute is related to a lack of conformity to an FSC standard, the issue will be brought to the certification body and will follow the formal FSC Dispute Resolution System.
  - If the dispute is around Controlled Wood risk designations and control measure outcomes, a complainant should contact the FSC US Director of Science and Certification, who will then address the issue in consultation with the FSC US Board of Directors. These complaints should be in written format and may be sent either electronically via email or in hard copy.
- For complaints and disputes involving Finch Paper's DDS
  - o Complaints are submitted to Finch via mail or email to:

Finch Paper LLC Woodlands Department ATTN: Wood Procurement Manager 1 Glen Street Glens Falls, NY 12804 Ben.Povak@finchpaper.com 518-793-2541 x 5550

- The complaint will be acknowledged by Finch Paper LLC.
- The relevant stakeholders will be informed, and an initial response will be sent to the complainant within 2 weeks of the receipt of the complaint.
- A preliminary assessment will determine whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources.
- A dialogue will be established by Finch Paper LLC with Complainant that aims to solve complaints assessed as substantial before further action is taken.
- Substantial complaints will be forwarded to the certification body and relevant FSC National Office for Finch's supply area within 2 weeks of receipt of the complaint. Information on the steps to be taken by Finch in order to resolve the complaint, as well as how a precautionary approach will be used, shall be included in the complaint.
- A precautionary approach towards the continued sourcing of the relevant material will be employed while a complaint is pending.
- A process will be implemented to verify a complaint assessed as substantial by Finch within 2 months of the receipt of the complaint.
- A determination on the corrective action will be reached, to be taken by the supplier to enforce the implementation by the supplier if the complaint has been assessed and verified as substantial. If a corrective action cannot be determined and or enforced, the relevant material and/or suppliers shall be excluded from delivering unacceptable material to Finch.
- Finch Paper LLC will further verify whether correction action has been taken by the suppliers and whether it is effective.
- o Material will be excluded from purchase if no corrective action was taken by the supplier.
- The Complainant, the Certification Body, and the relevant FSC National Office will be notified of the results of the complaint and any actions taken in its resolution.
- Copies will be maintained of all relevant correspondences.