

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 [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 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 <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
Preferred by Nature – US/ Canada

Preferred by Nature™

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 style="list-style-type: none"> Controlled Wood 8-foot Pulpwood Controlled Wood Paper Chips 	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

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
Contiguous State of New York, USA (Northeastern Region) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	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) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	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) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	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) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	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) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	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) (Adjacent to Maine/New Hampshire Border) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
Contiguous State of Rhode Island, USA (Northeastern Region) <ul style="list-style-type: none"> Controlled Wood Roundwood Pulpwood Controlled Wood Paper Chips 	1	FSC-NRA-USA V 1-0	Low risk
	2	FSC-NRA-USA V 1-0	Low risk
	3	FSC-NRA-USA V 1-0	Low risk
	4	FSC-NRA-USA V 1-0	Low risk
	5	FSC-NRA-USA V 1-0	Low risk
(Identified as possible sourcing area through plausibility analysis. <u>No controlled wood purchased from this area</u>)			

Supply Area	Controlled Wood Category	Reference to Risk Assessment	Risk Designation
Quebec, Canada	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)			
<ul style="list-style-type: none"> • 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 (*Glupemys 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 Lousewort (*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.
 - 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 Québec, the Société de conservation des milieux humides du Québec 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	Pulpwood and Paper Chip Inputs: Pulpwood is purchased from approximately 187 individual Controlled Wood (CW) suppliers. Pulpwood and paper chip inputs consist of: <ul style="list-style-type: none"> ● <u>Roundwood Pulpwood purchased from an internationally recognized Certification Body</u> such as FSC, SFI, PEFC, or American Tree Farm. 	CW purchasing (Roundwood and Chips) has 4 possible tiers: <ol style="list-style-type: none"> 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 regular field verification audits have not indicated a risk of	Control Measures to mitigate the risk of mixing of ineligible inputs: <ul style="list-style-type: none"> ● For Inputs (Roundwood Pulpwood, Paper Chips, Kraft) <u>purchased from an internationally recognized Certification Body</u> such as FSC, SFI, PEFC, or American Tree Farm, risk is mitigated through the supplier’s Chain of Custody Procedures. 	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 paperwork for correction (trip ticket left by supplier at mill

	<ul style="list-style-type: none"> • <u>CW Roundwood Pulpwood purchased from Finch Forest Management (FFM) operations (US New York, Vermont only)</u>- Wood is purchased from the Concession Holder by Finch Forest Management. Timber harvest is administered by Finch Forest Management foresters. • <u>CW Roundwood Pulpwood purchased directly from the Concession Holder (US only)</u>- Concession Holder contracts with an independent logging service provider to deliver CW to Finch Mill Woodyard. • <u>CW Roundwood Pulpwood purchased into Contracted Log Yards (US only)</u>- 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. Wood is segregated from all other non-Finch material inputs in the log yard. Contracted Log Yard hauls wood to Finch Woodyard. • <u>CW Roundwood Pulpwood purchased by Finch from a CW Supplier</u>- CW is purchased, harvested, and delivered by the CW Supplier from the Concession holder. 		<p>mixing of ineligible inputs entering the fiber stream.</p>	<ul style="list-style-type: none"> • For CW inputs purchased <u>from FFM operations</u>- Risk is mitigated through harvest planning and administrative oversight. Oversight is administered by Finch Forest Management foresters (including field verification) and Finch accounting staff to ensure all process controls are implemented in each step from the forest to the mill. • <u>For Paper Chip Inputs</u>- <ul style="list-style-type: none"> • <u>Sourcing Agreements</u>- CW Suppliers are required to sign a Vendor Agreement requiring chip suppliers to maintain records of CW Supplier name, Sub Supplier name, and material source location. • <u>Self-Declaration Form</u>- Chip Supplier identifies the sourcing area to the State and County level through supply chain analysis. • For CW inputs purchased from <u>Contracted Log Yards</u>. Control Measures include: <ul style="list-style-type: none"> • <u>Physical separation of material</u> from other products not purchased by Finch. • <u>Sourcing Agreements</u>- Contracted Log Yards sign a Vendor Agreement or Wood Supply Agreement, requiring suppliers to accurately report the CW 	<p>noted change in location), or 2. Errors were identified by Finch personnel and rectified through further discussion with CW Supplier. <u>No non-eligible inputs have been observed.</u></p>
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	<ul style="list-style-type: none"> • <u>CW Roundwood Pulpwood purchased by Finch from a CW Supplier and Sub Supplier (US only)</u>- CW is purchased from a Sub Supplier by the CW Supplier. Sub Supplier purchases CW from the Concession Holder. • <u>Paper Chips purchased from Chip Plants (US Only)</u>. Roundwood is supplied from Sub Suppliers to the Chip Plant. Roundwood is purchased from the Concession Holder by the Sub Supplier, and is then sold to the Chip Plant. Chip Plant produces chips and sends to Mill Woodyard via truck. All Chip Plants maintain a list of Sub Suppliers and relevant sourcing information, including Sub Supplier name, and harvest location (state, town). 			<p>supplier name, Sub Supplier, and material source location.</p> <ul style="list-style-type: none"> • <u>Suspension of ineligible inputs</u>- If a source has 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. • <u>For CW inputs purchased from Concession Holders, CW Suppliers and CW Sub Suppliers</u>- Control measures include: <ul style="list-style-type: none"> • <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. • <u>On site field verification</u>- Finch wood procurement staff conduct regular, random field audits to verify the accuracy of the CW sourcing claim. • <u>Suspension of ineligible inputs</u>- If a source has 	
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				<p>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.</p> <ul style="list-style-type: none"> • <u>Additional control measures for CW inputs purchased from Canada-</u> Control measures include: <ul style="list-style-type: none"> • Purchase of wood from 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 • Purchase of wood from a property managed by a forest engineer recognized by the "Ordre des ingenieurs forestiers du Quebec". • Annual audit of assessed 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
 - 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.
- 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.