

Public Notification Letter

FSC® Chain of Custody Controlled Wood Stakeholder Consultation

To: Interested Parties

From: SCS Global Services

Consultation period: 10/19/23 – 11/30/23

Re: Notification of intent to audit **Frank Miller Lumber Company** against FSC Chain of Custody Controlled Wood standard FSC-STD-40-005 V3-1

The Forest Stewardship Council® (FSC) requires that a certification body conducting an audit of a certified organization or applicant must consult stakeholders whenever the audit includes intent to source and use uncertified material in an FSC Chain of Custody (CoC) program according to the requirements in FSC-STD-40-005 V3-1 “Requirements for Sourcing FSC Controlled Wood”. Therefore, SCS Global Services (SCS) is seeking input from interested and directly affected stakeholders regarding the relevance, effectiveness, and/or adequacy of **Frank Miller Lumber Company’s** Due Diligence System (DDS).

An explanation of ‘FSC Controlled Wood’, as well as a copy of FSC-STD-40-005 V3-1, is available here: <https://ic.fsc.org/en/certification/types-of-certification/controlled-wood-02>; a copy of this standard is also available from SCS upon request.

Due Diligence Systems are required for certified organizations in order to avoid the sourcing and use of material originating from unacceptable sources in their FSC CoC program.

Directly affected stakeholders include any person, group of persons, or entity that is, with high probability, subject to the effects of the activities related to an organization’s controlled wood sourcing program, including the activities of their suppliers and sub-suppliers, as well as those who influence risk identified through the organization’s Due Diligence System.

This letter serves as SCS’ invitation to directly affected stakeholders to participate in our consultation process. This letter also serves as SCS’ public notification for any interested stakeholders, who are also invited to participate in the consultation process. Participation in this stakeholder consultation process is voluntary; stakeholders are not required to submit comments.

Scope of audit and audit details:

The audit will assess the conformity of the organization’s controlled wood program – including Risk Assessment(s) and DDS – according to the certification requirements as per FSC-STD-40-005 V3-1.

The company’s DDS Public Summary and Risk Assessment (excluding confidential information), as well as any other information or documents deemed relevant for the purpose of this stakeholder consultation, are included as appendices to this letter—see below. For a list of the information that is required to be publically available for stakeholder consultation by SCS, see FSC-STD-40-005 V3-1, Section 6.

Additional certificate holder information:

<https://search.fsc.org/en/certificate/a0240000005sU3vAAE/>

Options for participation and provision of comments:

Please submit written comments and evidence (where appropriate) by mail, FAX or email to SCS:

SCS Global Services
Att'n: Chain of Custody Certification Services
2000 Powell Street, Suite 600
Emeryville, CA 94608

Fax: 510-452-6882

Email: CWStakeholder@SCSGlobalServices.com

A summary of the stakeholder consultation and comments received will be made publically available on the FSC certificate database, as per FSC-STD-20-011 V4-2. Verbatim comments will only be published with prior consent from the stakeholder and will not be associated with stakeholder names.

Note that, while SCS is required to evaluate all information and comments objectively, SCS certification decisions are affected by stakeholder comments only insofar as the comments provide evidence of conformity or nonconformity to the applicable requirements.

Within 30 days of making our certification decision, SCS will respond to all stakeholders who provided comments to explain how their comments were taken into account.

More information about FSC and SCS can be found on our respective websites: www.fsc.org and www.scsglobalservices.com.

FSC Controlled Wood Due Diligence Summary

Frank Miller Lumber Company

Prepared by Sarah Dean, American Green Consulting Group on October 11, 2023

Note: as of October 5, 2019, all Controlled Wood Certificate Holders (CH) sourcing materials that they wish to control from the conterminous United States (excludes Alaska, Hawaii and US Territories) must have updated their DDS to incorporate the FSC US National Risk Assessment. Sourcing from Alaska, Hawaii or US Territories requires a company risk assessment. Sourcing from Canada, either directly, or indirectly due to logical supply area overlap, requires incorporation of the FSC CAN National Risk Assessment.

When complete, this form will meet the requirements in Section 6 of FSC-STD-40-005 V3-1 "Publicly Available Information".

1. Due Diligence System information:

Description of Supply Area	Risk Designation	Indicator(s) for Supply Area Specified Risk Designation	Risk Assessment
Illinois	Low Risk all – not sourcing from Alexander, Pulaski counties or within 100 miles	Categories 1, 2, 4, 5 Late Successional Bottomland Hardwoods (2 counties – Alexander, Pulaski)	FSC-NRA-USA v.1-0
Indiana	Low Risk Specified Risk within 100 miles	Categories 1, 2, 4, 5 Mesophytic Cove Sites, Late Successional Bottomland Hardwoods, Central Appalachian CBA	FSC-NRA-USA v.1-0
Kansas	Low Risk	All categories	FSC-NRA-USA v.1-0
Kentucky	Low Risk Specified Risk Within 100 miles	Categories 2, 4, 5 Late Successional Bottomland Hardwoods, Mesophytic Cove Sites, Central Appalachian CBA Cheoah Bald Salamander	FSC-NRA-USA v.1-0

Michigan	Low Risk	All Categories	FSC-NRA-USA v.1-0
Ohio	Low Risk	Categories 1, 2, 4, 5	FSC-NRA-USA v.1-0
	Specified Risk	Mesophytic Cove Site	
Pennsylvania	Low Risk	Categories 1, 2, 4, 5	FSC-NRA-USA v.1-0
	Specified Risk	Mesophytic Cove Sites	
Tennessee	Low Risk	Categories 1, 2, 4, 5	FSC-NRA-USA v.1-0
	Specified Risk	Mesophytic Cove Sites, Central Appalachian CBA	
	Within 100 miles	Cheoah Bald Salamander, Southern Appalachian CBA, Patch nosed Salamander, Conversion	

2. Complaints

<p>Procedure for filing complaints</p>	<p>Our complaints procedure consists of the following steps and will be completed within two weeks of receiving the initial complaint:</p> <ol style="list-style-type: none"> 1. We will acknowledge receipt of the complaint via email whenever possible. When an email address is not provided (or refused by request) by the complainant, we will send a written acknowledgement via US postal mail <ol style="list-style-type: none"> 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. We will conduct a preliminary assessment to determine the substance of any comment or complaint. Complaints will be defined as “substantial” or “not substantial”. <ol style="list-style-type: none"> a. This assessment will include, but not be limited to, the breadth and/or specificity of the complaint, and the standing of the complainant. <ol style="list-style-type: none"> 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.
<p>Contact information of the person or position responsible for addressing complaints</p>	<p>American Green Consulting Group 888-662-8854</p>

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

X 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
3.1 Wood harvested from forests in which high conservation values are threatened by management activities	<p><i>3.1 HCV 1: Central Appalachian CBA, Cheoah Bald Salamander, Southern Appalachian CBA, Patch-nosed Salamander</i></p> <p><i>CM3.1 b., 3.3 Educational materials, and landowner outreach or coordination with a local conservation organization, as determined by the specified risk area.</i></p> <p><i>CM3.1 a.i., 3.3 - American Green attendance at all required FSC-US mitigation meetings</i></p> <p>Supplier Declaratsion are collected that state material from unacceptable sources is not being provided. Contracts provide requirements of FML Company for suppliers that deliver wood to the facility.</p>
3.1 Wood harvested from forests in which high conservation values are threatened by management activities	<p><i>3.1 HCV 3: Mesophytic Cove Sites, Late Successional Bottomland Hardwoods</i></p> <p><i>CM3.1 b., 3.3 Educational materials, and landowner outreach or coordination with a local conservation organization, as determined by the specified risk area.</i></p> <p><i>CM3.1 a.i., 3.3 - American Green attendance at all required FSC-US mitigation meetings</i></p>

	Supplier Declarations are collected that state material from unacceptable sources is not being provided. Contracts provide requirements of FML Company for suppliers that deliver wood to the facility.
4.1 Wood from forests being converted to plantations or non-forest use	<p>4.2: <i>Conversion</i></p> <p>CM4.2.a. Certificate holder attends FSC US-coordinated Controlled Wood Regional Meetings when they occur. This is done either through representation from American Green Consulting and/or through direct company representation.</p> <p>CM4.2.b. Educational materials, and landowner outreach or coordination with a local conservation organization, as determined by the specified risk area.</p>

Assessment Indicator Requiring Control Measure(s)	Control Measures for Addressing Risk of Supply Chain Mixing of Unacceptable or Non-eligible Sources
3.1 Wood harvested from forests in which high conservation values are threatened by management activities and 4.1 Wood from forests being converted to plantations or non-forest use	<p>Risk of Mixing Material with Non-eligible Inputs into Supply Chain During Transport, Processing, and Storage: The organizations assessed this risk by site visits and/or confirmation of supplier procurement and operational policies.</p> <p>Mixing of Non-eligible inputs has been determined as No Risk for all suppliers.</p> <p>--</p> <p>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.</p>

Stakeholder Consultation, Technical Experts, and Field Verifications
Company utilizes 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.

While the information included in American Green educational materials is all based on publicly available research, the following experts partnered with AGC in creating the noted materials.

The Forest Stewards Guild – Conversion, Late Successional Bottomland Hardwoods, and Southern Appalachian CBA

- Areas where the Forest Stewards Guild is active may be found here: <https://foreststewardsguild.org/where-we-work/>
- Qualifications of Forest Stewards Guild staff may be found here: <https://foreststewardsguild.org/meet-the-team/>

Ecoforesters - Mesophytic Cove Sites and Central Appalachian CBA

- Ecoforesters is active throughout Appalachia. Information about their work may be found here: <https://www.ecoforesters.org/positive-impact-forestry/>
- Qualifications of Ecoforesters staff may be found here: <https://www.ecoforesters.org/about-us/meet-the-team/>

The Amphibian and Reptile Conservancy – Cheoah Bald Salamander and Patch Nosed Salamander

- The Amphibian and Reptile Conservancy is a not-for-profit 501(c)(3) charitable organization dedicated to the conservation of amphibians and reptiles. Information about their work may be found here: <https://amphibianandreptileconservancy.org/what-we-do/>
- Qualifications of ARC staff may be found here: <https://amphibianandreptileconservancy.org/about/arc-directors/>