

## Public Notification Letter

### FSC® Chain of Custody Controlled Wood Stakeholder Consultation

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To: Interested Parties

From: SCS Global Services

Consultation period: November 9<sup>th</sup> 2023 – December 21<sup>st</sup> 2023

Re: Notification of intent to audit **Indiana Department of Natural Resources Division of Forestry** against FSC Chain of Custody Controlled Wood standard FSC-STD-40-005 V3-1

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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 **Indiana Department of Natural Resources Division of Forestry’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:**

**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](mailto: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](http://www.fsc.org) and [www.scsglobalservices.com](http://www.scsglobalservices.com).

## Publicly Available Information for Organizations Certified to the FSC Controlled Wood Standard (FSC-STD-40-005)<sup>1</sup>

<b>Organization Name</b>	
<b>FSC COC Certificate Number</b>	Organization Name: Indiana Department of Natural Resources, Division of Forestry Indiana DNR COC Group # SCS-COC-002041

### 1. Procedure for Filing Complaints

<b>Name of Authorized Representative / Position Responsible</b>	Chris Gonso  FSC CoC Administrator  Indiana Department of Natural Resources Division of Forestry 402 West Washington Street Room W296 Indianapolis, IN 46204-2739
<b>Contact Detail (Contact information for person or position responsible for addressing complaints)</b>	cgonso@dnr.in.gov; 317-690-4738
<b>Procedure for filing complaints</b>	<b>Note: The complaint procedure shall indicate the <u>timelines</u> and <u>processing steps</u> when a complaint is received. For further details on complaints procedure, see section 7 in FSC-STD-40-005</b>  See section 2.4 in attached document

<sup>1</sup> This document is meant as guidance only, utilization of templates and guidance documents is no guarantee of conformity with FSC requirements. It is your organization's responsibility to conform to relevant FSC requirements.

## 2. Summary of Organization’s Due Diligence System

Information regarding an organization’s due diligence system must be made publically available. This publically available information may be provided within this summary document, or as separate documentation. Please selection an option below.

**DDS Summary is provided in a separate Annex. Provide name of document or summary**

**location:** Appendix D of Group Entity Procedures <https://www.in.gov/dnr/forestry/forest-certification/chain-of-custody-certification/>

(e.g. <http://www.xxcompany.com/dds> or Annex XXX., written summary of DDS XXX)

**DDS summary is provided in this document. Complete sections 3 through 8.**

## 3. Description of the Supply Area(s) and Respective Risk Designation(s)

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
XX region,  XX country	Category 1	Choose an item.	<input type="checkbox"/> FSC risk assessment	e.g. FSC-NRA-DE V1-0
	Category 2	Choose an item.		
	Category 3	Choose an item.	<input type="checkbox"/> Extended Company Risk Assessment <sup>2</sup>	ECRA-CW-xx country V1
	Category 4	Choose an item.		
	Category 5	Choose an item.		

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
XX region,  XX country	Category 1	Choose an item.	<input type="checkbox"/> FSC risk assessment	e.g. FSC-NRA-DE V1-0
	Category 2	Choose an item.		
	Category 3	Choose an item.	<input type="checkbox"/> Extended Company Risk Assessment	ECRA-CW-xx country V1
	Category 4	Choose an item.		
	Category 5	Choose an item.		

**NOTE:**

- The description of the supply area should allow the identification of the area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category.
- The risk designation provided in the table is the designation provided by the risk assessment PRIOR to the application of control measures.

Please copy and paste tables to insert more source area(s) as needed.

<sup>2</sup> If an organization is using an Extended Company Risk Assessment, the ECRA must also be submitted with this public summary.

#### 4. Description of the Supply Chain Risk Assessment and Respective Risk Designation(s)

Supply chain sourcing area / Supply chain actor	Description of Risk Assessment (risk of mixing material with non-eligible inputs in the supply chain/s during transport, processing, and storage)	Risk Level (Low/Specified)
		Choose an item.
		Choose an item.
		Choose an item.

#### 5. Control Measures Implemented by the Organization

**Not Applicable - All risk designations from the supply area risk assessments and supply chain risk assessments are low risk. Skip to section 6.**

Sourcing Area/Supply chain area	Indicator with specified risk	Description of Control measure

Sourcing Area	Indicator with specified risk	Description of Control measure

Note: Please copy and paste additional tables as needed.

#### 6. Stakeholder Consultation Summary

**Not Applicable - The organization did not engage in a formal stakeholder consultation process. Skip to section 7.**

The areas for which the stakeholder consultation has been conducted (e.g.	(e.g. geo-reference data, state, province, supply unit)
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<b>geo-reference data, state, province, supply unit)</b>	
<b>Stakeholder engagement date(s):</b>	
<b>Means of Contact, please check all that apply</b>	
<input type="checkbox"/> Face to face meetings <input type="checkbox"/> Personal contacts by phone <input type="checkbox"/> Email, or letter <input type="checkbox"/> Notice published in the national and/or local press	<input type="checkbox"/> Notice published on relevant websites <input type="checkbox"/> Local radio announcements <input type="checkbox"/> Local customary notice boards <input type="checkbox"/> Social media broadcast
<b>List of the stakeholder groups invited by the organization to participate in the consultation, please check all that apply</b>	
<input type="checkbox"/> Economic interests <input type="checkbox"/> Social interests <input type="checkbox"/> Environmental interests <input type="checkbox"/> FSC-accredited certification bodies active in the country <input type="checkbox"/> National and state forest agencies	<input type="checkbox"/> Experts with expertise in controlled wood categories <input type="checkbox"/> Research institutions and universities <input type="checkbox"/> FSC regional offices, FSC network partners, registered standard development groups and NRA working groups in the region
<b>Summary of the stakeholder comments received and considerations</b>	
Stakeholder comment	
Consideration	
Stakeholder comment	
Consideration	
<b>The organization's justification for concluding that the material sourced from these areas can be used as controlled material or sold with the FSC Controlled Wood claim</b>	
<p>Note: Comments shall only be published with prior consent from the consulted stakeholder and not associated with stakeholder's personal identifiable information.</p>	

## 7. Expert Engagement Summary

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**Not Applicable - The organization did not engage experts in the development of control measures. Skip to section 8.**

Expert A	
Qualification	
Scope of Service	

Expert B	
Qualification	
Scope of Service	

**NOTE:** For individual experts this includes the experts' qualifications and the scope of their services. The personal identifiable information such as names of experts, their license/registration numbers (if applicable) shall only be included with given consent from experts. For publicly available expertise, the specific sources of information shall be cited.  
**Note:** Please copy and paste additional tables as needed.

## 8. Field Verification Summary

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**Not Applicable - The organization did not conduct field verification as a control measure.**

Findings from field verification	
Steps taken by the organization to address identified non-conformities	

Findings from field verification	
Steps taken by the organization to address identified non-conformities	

**Note:** Please copy and paste additional tables as needed.

The confidential nature of the information may be determined by the legislation that the organization must comply with. Commercially sensitive information, and the names of individual landholders, shall be treated as confidential information.

**Not Applicable - The organization has not excluded confidential information.**

The organization's justification for the exclusion of confidential information.



## Appendix D. Risk Assessment.

**Date of Risk Assessment: 09/17/2009 (reviewed 4/10/2012, reviewed/updated 1/21/22, 7/21/22)**

**Date Approved: 1/8/2019**

**Country and District of Origin: USA – All States and Counties as described in this District of Origin. States included in this District of Origin include: Illinois** (except Alexander County and Pulaski County), **Indiana, Iowa, Michigan, Minnesota, Missouri** (except Cape Girardeau County, Scott County, and Mississippi County), **New York, Pennsylvania** (all counties except: Adams, Allegheny, Armstrong, Beaver, Bedford, Berks, Blair, Butler, Cambria, Carbon, Centre, Clarion, Clearfield, Clinton, Columbia, Cumberland, Dauphin, Fayette, Franklin, Fulton, Greene, Huntingdon, Indiana, Jefferson, Juniata, Lackawanna, Lawrence, Lebanon, Lehigh, Luzerne, Lycoming, Mifflin, Monroe, Montour, Northampton, Northumberland, Perry, Schuylkill, Snyder, Somerset, Sullivan, Susquehanna, Union, Venango, Washington, Wayne, and Westmoreland) **Wisconsin, All Kentucky counties are included in this District of Origin except:** Ballard, Bath, Bell, Boyd, Breathitt, Carlisle, Carter, Clay, Clinton, Cumberland, Elliott, Estill, Fleming, Floyd, Fulton, Greenup, Harlan, Johnson, Knott, Knox, Laurel, Lawrence, Lee, Leslie, Letcher, Lewis, Magoffin, Martin, McCreary, Menifee, Monroe, Montgomery, Morgan, Owsley, Perry, Pike, Powell, Pulaski, Rockcastle, Rowan, Wayne, Whitley, and Wolfe. **Tennessee counties included in this District of Origin include:** Benton, Carroll, Cheatham, Chester, Crockett, Davidson, Decatur, Dickson, Dyer, Fayette, Gibson, Hardeman, Hamblen, Hardin, Haywood, Henderson, Henry, Hickman, Humphreys, Houston, Lawrence, Lewis, Madison, McNary, Montgomery, Perry, Robertson, Stewart, Sumner, Trousdale, Unicoi, White, White, Williamson and Wilson **All Ohio counties are included in this District of Origin except:** Athens, Belmont, Carroll, Coshocton, Guernsey, Harrison, Hocking, Jefferson, Lawrence, Monroe, Morgan, Muskingum, Noble, Perry, Pike, Scioto, Tuscarawas, Vinton, and Washington.

According to the applicable FSC risk assessment (FSC-US NRA, V1-0) the above District of Origin purchase area contains no specified risks.

<b>Certificate Holder</b>	Indiana Division of Forestry	<b>Certification Body</b>	Scientific Certification Systems
<b>FSC CW Certificate Code</b>	SCS-CW-002041	<b>Date of CB Approval</b>	January 8, 2019
<b>Date of Risk Assessment</b>	09/17/2009		
<b>Certificate Holder Address</b>	Indiana Division of Forestry 402 W. Washington, Room W-296 Indianapolis, IN 46204	<b>Title</b>	FSC Controlled Wood Assessment Summary for Indiana Division of Forestry

<p><b>1. Illegally Harvested Wood</b>  The district of origin may be considered low risk in relation to illegal harvesting when <u>all</u> of the following indicators related to forest governance are present:</p>	<p><b>Findings and Resources</b></p>	<p><b>Resulting Level of Risk</b></p>
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<p>1.1 Evidence of enforcement of logging related laws in the district.</p>	<p>1. American Hardwood Export Council (AHEC) Legality Study: (An Assessment of Risk: Legality &amp; Sustainability of US Hardwood Exports). The AHEC recently commissioned an assessment of illegal logging in the hardwood producing areas of United States. The study area includes all states east of and adjacent to the Mississippi River. This report reports that the study area is determined to be LOW RISK for illegally harvested wood. The report is available from AHEC.  <a href="http://www.ahec.org/publications/AHEC%20publications/AHEC_RISK_ASSESSMENT.pdf">http://www.ahec.org/publications/AHEC%20publications/AHEC_RISK_ASSESSMENT.pdf</a></p> <p>There have been international assessments of illegal logging from the World Wildlife Fund (WWF), Seneca Creek Associates, and Wood Resources International. These organizations have identified the areas where they have evidence of systematic illegal logging. These areas do not include the U.S. or Canada. In addition, the U.S. and Canada score high in measures of good governance such as offered by Transparency International and the World Bank. See the World Bank's website for good governance data compiled by the World bank and or Transparency International indices.</p> <p>It is arguable that illegal logging is a problem in the United States; however, when compared to the global situation, relatively, illegal logging in this country is of such small magnitude or frequency that it cannot be considered to be systematic in any areas of the U.S. In addition, any illegal logging that does occur is often prosecuted or the rightful owner has means to remedy the situation.</p> <p>2. <a href="http://www.illegal-logging.org">www.illegal-logging.org</a> provides no evidence of anything affecting the Eastern USA sourcing area.</p> <p>3. <a href="http://www.in.gov/dnr/forestry/files/fo-timber-harvest.pdf">http://www.in.gov/dnr/forestry/files/fo-timber-harvest.pdf</a> on the Indiana Division of Forestry website summarizes legally harvested timber within the state of Indiana and reports that a negligible amount (0.04%) was illegally acquired during the previous 5-year period; the document further describes the state laws that apply. All other states within the region have laws affecting illegal harvest of timber with low rates of illegal acquisition.</p>	<p><input checked="" type="checkbox"/> Low Risk  <input type="checkbox"/> Unspecified Risk</p>
<p>1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.</p>	<p>The Lacey Act (originally enacted in 1900) recently amended May 22, 2008, with the Food, Conservation, and Energy Act of 2008. This amendment expanded its protection to a broader range of plants and plant products including logging. The Lacey Act makes it unlawful to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any plant in violation of the laws of the United States, a state, a Native American tribe, or any foreign law that protects plants. The Lacey Act prohibits all trade in plant and plant products (e.g., furniture, paper, or lumber) that are illegally sourced from any U.S. state or any foreign country, requires importers to declare the country of origin of harvest and species name of all plants contained in their products, and establishes penalties for violation of the Act.</p>	<p><input checked="" type="checkbox"/> Low Risk  <input type="checkbox"/> Unspecified Risk</p>

<p>1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin.</p>	<ol style="list-style-type: none"> <li>1. <a href="http://www.panda.org">www.panda.org</a> reports no instances of illegal logging within the USA.</li> <li>2. <a href="http://www.eldis.org">www.eldis.org</a> provides no evidence of illegal harvesting within the USA.</li> <li>3. Most states have laws related to illegal harvesting and penalties. For example, Indiana (<a href="http://www.in.gov/dnr/forestry/files/fo-timber-harvest.pdf">http://www.in.gov/dnr/forestry/files/fo-timber-harvest.pdf</a>) reports that only 0.04% of timber within the state was illegally acquired, a majority of which are accidental problems that are settled between parties.</li> </ol>	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
<p>1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade.</p>	<p>AHEC Legality Study concluded that that wood procured in this area can be considered Low Risk to threat to legality, based on the determination that there is no reported systematic illegal logging reported in this area and regulatory processes have been found to be highly effective.</p>	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
<p><b>2. Wood harvested in violation of traditional or civil rights</b>  The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when <u>all</u> the following indicators are present:</p>	<p><b>Findings and Resources</b></p>	<p><b>Risk Level</b></p>
<p>2.1 There is no UN Security Council ban on timber exports from the country concerned.</p>	<ol style="list-style-type: none"> <li>1. <a href="http://www.un.org/Docs/sc/unsct/resolutions07.htm">http://www.un.org/Docs/sc/unsct/resolutions07.htm</a> address numerous countries around the world with no relevance to this area.</li> <li>2. The AHEC Legality Study reports no bans on timber exports from this area.</li> <li>3. <a href="http://www.globalwitness.org/">http://www.globalwitness.org/</a> reports no issue relative to this area</li> </ol>	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
<p>2.2 The country or district is not designated a source of conflict timber (E.g., USAID Type 1 conflict timber).</p>	<ol style="list-style-type: none"> <li>1. USAID Type 1 relates to conflict timber in Asia and Africa and does not apply to this area.</li> <li>2. The entire USA does not comply as a designated source of conflict timber.</li> </ol>	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
<p>2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and</p>	<p>The USA has comprehensive laws prohibiting the use of child labor or violation of worker rights.</p>	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk

Rights at work taking place in forest areas in the district concerned.		
2.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned.	<p>1. <a href="http://www.fscus.org">www.fscus.org</a> confirms that the USA has federal and state laws that preclude such violations and there are recognized and effective practices in place to resolve conflicts over traditional and cultural use rights.</p> <p>2. The AHEC legality study concludes that wood procured in this area can be considered Low Risk of violating traditional and civil rights. There are recognized and equitable processes in place to resolve conflicts of substantial magnitude.</p>	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
2.5 There is evidence of no violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.	<a href="http://www.fscus.org">www.fscus.org</a> – ILO Fundamental Principles and rights at work are generally respected in the USA.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
<p><b>3. Wood harvested from forest in which high conservation values are threatened by management activities</b></p> <p>The district of origin may be considered low risk in relation to threat to high conservation values if:</p> <p>a) indicator 3.1 is met;  <b>or</b>  b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of</p>	<p><b>Findings and Resources</b></p>	<p><b>Risk Level</b></p>

origin by non-compliance with 3.1.		
3.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten ecoregionally significant high conservation values. OR	1. AHEC legality Study. A strong system of forest protection is in place across the entire USA.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.	1. <a href="http://www.worldwildlife.org/science/ecoregions/WWFBinaryitem4810.pdf">http://www.worldwildlife.org/science/ecoregions/WWFBinaryitem4810.pdf</a> identifies two forested eco-regions within this area that are listed as vulnerable or critical or endangered. The Appalachian Mixed Mesophytic is listed as vulnerable; the Southeastern Coniferous and Broadleaf Forest is listed as Critical or Endangered. All states within these two eco-regions have extensive programs to identify and protect biodiversity hotspots or nature preserves to assure continued survival; an extensive system of national forests and wildlife preserves protects thousands of acres; NGOs such as The Nature Conservancy have additional systems of Nature Preserves. With the level of detection and preservation within this area, there is little risk to high conservation values. 2. The Nature Serve network includes member programs operating in all 50 U. S. states as well as Canada and many other countries around the world. The Indiana Department of Natural Resources, as an example, has an active nature preserves program ( <a href="http://www.in.gov/dnr/naturepreserve/">http://www.in.gov/dnr/naturepreserve/</a> ). The Division of Nature Preserves locates and manages nature preserves to protect areas of high conservation value, and actively searches for the state's most significant natural areas through an intensive statewide inventory as part of a worldwide system of natural heritage programs.	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Unspecified Risk
<b>4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses</b> The district of origin may be considered low risk in relation to conversion of forest to plantations or non-	<b>Findings and Resources</b>	<b>Risk Level</b>

<p>forest uses when the following indicator is present:</p> <p>[Note: the change from plantations to other land uses is not considered as conversion].</p>		
<p>4.1 There is no net loss AND no significant rate of loss (&gt; 0.5% per year) of natural forests and other naturally wooded ecosystems such as savannahs taking place in the eco-region in question.</p>	<p>1. US Forest Service Forest Inventory and Analysis data are available for each state within this area. The growth of forests generally exceeds removals. The total acreage of forest land in most state is generally stable. According to the US Forest Service document <a href="http://www.ncrs.fs.fed.us/pubs/gtr/gtr_nc241.pdf">http://www.ncrs.fs.fed.us/pubs/gtr/gtr_nc241.pdf</a>, only 10 of the 31 states in this area had declining forest acreages during the 15-year period from 1987 to 2002. Annual rates of decline in those states ranged from 0.27% in New Hampshire to 0.01 percent in Maine. Forest acres increased in the remaining 21 states at an annual rate of 0.01 percent to a high of 1.83 percent in Iowa. Overall, in this 31-state area, acres of forest increased from 348,860,000 acres to 359,475,000 acres, an annual increase of 0.20.</p> <p>A more recent document, Forest Resources of the United States, 2007, available at <a href="http://fia.fs.fed.us/program-features/rpa/">http://fia.fs.fed.us/program-features/rpa/</a>, reports similar information. This document compares state by state forest acreages between 2007 and 1997. This summary reinforces the concept that forest acreage in the 31-state area is increasing, from 358,407,000 acres in 1997 to 361,746,000 acres in 2007, an increase of 3,339,000 acres or 0.93% (annual increase of 0.09%). However, this 10-year period indicates that 14 of the 31 states are declining in forest acreage, while 17 are increasing. Alarmingly, according to this report, three states exceed the 0.5% annual deforestation rate (Maryland at -0.51%, Kentucky at -0.58%, and Rhode Island at -1.38%), indicating that a more detailed evaluation of the deforestation data in these three states was warranted.</p> <p>The data in the above-mentioned Forest Resources of the United States, 2007, was based on Forest Inventory and Analysis Information from the various states. The inventory schedule varies from state to state, so the reported information does not always apply directly to the 10-year period. To determine current deforestation rates in these three states, we consulted the USFS FIA online database query tool, EVALIDator Version 4.0, on September 17, 2009. Detailed information from the three questionable states is as follows:</p> <p>Maryland: A complete report of Maryland resources is dated 1999, with annual surveys completed in 2004-2006. The most accurate comparison is between the 1999 survey and the three-year summary of 2004-2006, for a 7-year comparison. The forest acreage in Maryland</p>	<p><input checked="" type="checkbox"/> Low Risk  <input type="checkbox"/> Unspecified Risk</p>

<p>decreased from 2,564,730 acres in 1999 to 2,437,799 in 2006 for a total decline of 126,931 acres during the 7-year period. This represents an annual decline of 0.72%. The Table also reports that the sampling error is 2.21 percent from the 1999 survey and 3.3% for the 2004-2006 survey. Applying these errors to the data, the actual change is likely within the range of 10,197-acre increase to a 264,059-acre decrease. On a positive note, for Maryland's forest resources, the state recently passed (May 7, 2009) the "<i>Sustainable Forest Act of 2009</i>" and the complementary "<i>No Net Loss of Forest Act</i>" to protect existing forests and encourage the planting of more trees to replace forests that have been cleared for development. These two bills are intended to protect the states forested area in perpetuity, so the sustainability of Maryland's forests is established in state law. Also noteworthy, Maryland is a small state, accounting for only 0.71% of the forest acreage within the 31-state area, so the contribution of Maryland timber to the Indiana forest products industries is negligible.</p> <p>Kentucky: Complete inventories of Kentucky resources were completed in 1988 and a 5-year report covering the years 2000-2004. Since then, annual reports have been completed for 2005 and 2006. Two ways to compare the current change in acreage is to compare the 2006 one-year estimate with the 2000-2004 5-year estimate. This comparison indicates an increase of 119,347 acres from 2004 to 2006, an annual increase of 0.50%. Comparing the 1988 acreage to the one-year 2006 acreage indicates an annual rate of decline of 0.24%. Furthermore, comparing the 1988 survey with the 2004 survey numbers (the two surveys with the best estimate or lowest sampling errors) the annual rate of decline is 0.34%. In conclusion, the change in forest acres in the state of Kentucky is in the range of -0.34% annually to +0.50%, none at the 0.50% deforestation rate.</p> <p>Rhode Island: A complete inventory of Rhode Island Forest resources was completed in 1985 and 1998, with a 4-year summary of the years 2003-2006 being the most recent information available. A comparison of the 1998 survey with the 2003-2006 survey indicates a reduction in forest acreage from 393,250 acres to 364,644 acres, a reduction of 28,606 acres or an annual rate of 0.94%. Reported sampling errors for these two inventories are 5.47% and 4.46% respectively. Also noteworthy, Rhode Island Forest acres account for only 0.10% of the forest acreage in the 31-state area, so the contribution of Rhode Island timber to the forest industry in Indiana is negligible.</p> <p>Because the purchase area is experiencing an increase in forest acreage, and the only two states individually experiencing a decline greater than 0.5% annually contribute a combined 0.81% of forest acreage in the region, the area is at low risk of deforestation.</p>	
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<p><b>5. Wood from forests in which genetically modified trees are planted</b></p> <p>5. The district of origin may be considered low risk in relation to wood from genetically modified trees when <u>one</u> of the following indicators is complied with:</p>	<p><b>Findings and Resources</b></p>	<p><b>Risk Level</b></p>
<p>a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned. <b>OR</b></p>	<p><a href="http://www.fscus.org/images/documents/controlled_wood/5_07/US%20CW%20Guidance%20-%20v3.2.doc">http://www.fscus.org/images/documents/controlled_wood/5_07/US%20CW%20Guidance%20-%20v3.2.doc</a> states that currently the only possible source of genetically modified wood is from China plantations of one species, Lombardy poplar (<i>Populus nigra</i>). No other species is available as GMO; the use of Lombardy poplar in general and specifically from China is extremely low to non-existent</p>	<p><input checked="" type="checkbox"/> Low Risk  <input type="checkbox"/> Unspecified Risk</p>
<p>b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use. <b>OR</b></p>	<p>AHEC Legality Study – At this time all wood sourced in the US can be considered to not contain wood from GMO trees.</p>	<p><input checked="" type="checkbox"/> Low Risk  <input type="checkbox"/> Unspecified Risk</p>
<p>c) It is forbidden to use genetically modified trees commercially in the country concerned.</p>	<p>NA</p>	<p><input type="checkbox"/> Low Risk  <input type="checkbox"/> Unspecified Risk</p>

# DNR FSC Chain of Custody Controlled Wood Purchase Area

