

Public Notification Letter

FSC® Chain of Custody Controlled Wood Stakeholder Consultation

To: Interested Parties

From: SCS Global Services

Consultation period: 06.04.24-07.16.24

Re: Notification of intent to audit **Farley's Forest Products, Inc.** 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 Farley's Forest Products, Inc. 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

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.

 <p>FARLEY'S FOREST PRODUCTS, INC. P.O. Box 71810 Tuscaloosa, AL 35407 Office (205)758-4499 Fax (205)758-4896</p>	Document Name: <h2 style="text-align: center;">Controlled Wood / Due Diligence Procedure</h2>		
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Controlled Wood/Due Diligence Procedure Summary for Public Distribution (first 3 pages only) Farley's Forest Products – Procurement Credit System

Note: This summary of the DDS will be included in the public summary of the certification report by the FSC Certification Body on the FSC database.

*FSC STD-40-005 V3.1, Section 6 Publically available information, 6.1 requires that:
“The organization shall provide a written summary of its DDS to the certification body. The written summary shall include the following information:*

- a) A description of the supply areas and respective risk designations;*
- b) Reference to the applicable FSC risk assessment;*
- c) The organization's own risk assessment (excluding confidential information);*
- d) The procedure for filing complaints; and*
- e) Contact information of the person or position responsible for addressing complaints.”*

Controlled Wood/Due Diligence Program Scope

The company is implementing this Controlled Wood Procedure to achieve conformance with the Forest Stewardship Council® (FSC®) Standard for Company Evaluation of Controlled Wood in order to avoid material from unacceptable sources. This procedure is part of the Chain of Custody and Controlled Wood program addressing company logging and trucking operations in Alabama and Mississippi involving FSC 100% inputs and inputs of controlled material (round-wood), and FSC 100% outputs (round-wood). The round-wood suppliers are categorized according to the following:

- a) Suppliers that supply FSC 100% (certified) round-wood with appropriate documentation; and
- b) Other (non-certified) wood purchased directly from forest owners and harvested/delivered under the direction of the company by “cut and haul” contractors who are within the scope of Farley's program.

Wood volumes of type b that are part of the FFP Procurement Credit System are included in the company's controlled wood verification program.

Supply Area

All wood is that is part of this program is sourced from within Alabama and Mississippi, specifically from the Mississippi and Alabama counties shown in Appendix B.

The company has identified all of its wood suppliers and their incoming material as coming from either “Certified content”, “Controlled Wood”, or “controlled material” sources. The company has notified all of its suppliers that it will not accept “unacceptable/controversial” sources of wood. It has incorporated the controlled wood restrictions in its policy statements and supplier agreements.



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FSC National Risk Assessment and Risk Designations

The company determined that there is no risk of mixing material with non-eligible inputs in its supply chains during transport, processing, and storage.

The company relies on the FSC U.S. Controlled Wood National Risk Assessment (NRA) to assess the five unacceptable sources of wood:

1. Wood harvested illegally.
2. Wood harvested in violation of traditional and civil rights.
3. Wood harvested from forests with a high conservation value that is threatened by management activities.
4. Wood harvested from forests being converted to plantations or non-forest use.
5. Wood from forests in which genetically modified trees are planted.

The NRA found “low risk” for FSC Categories 1, 2, and 5 for all forested portions of the conterminous 48 states.

There are three mapped areas of specified risk that overlap the company’s supply area:

FSC Category 3- High Conservation Values

- Southern Appalachian Critical Biodiversity Areas
- Late Successional Bottomland Hardwoods
- Native Longleaf Pine Systems

To address these risks, the company has implemented the mandatory Control Measures and has selected the mitigation options listed below:

Specified Risk	Mitigation Option
Southern Appalachian CBA	<i>Central Theme</i> - Education & Outreach: Training Materials and Training for Foresters and for Loggers (company and suppliers)
Late Successional Bottomland Hardwoods	Same as above
Native Longleaf Pine Systems	Same as above

Procedure for Filing Complaints, Including Contact Person

Complaints regarding Farley’s Due Diligence System and/or Risk Assessment should be directed to the company’s Central Office Management Representative:

Brian Farley, Vice President
Farley's Forest Products, Inc.
P.O. Box 71810
Tuscaloosa, AL 35407
Brian@farleysforestproducts.com



FARLEY'S FOREST
PRODUCTS, INC.

P.O. Box 71810 Tuscaloosa, AL 35407
Office (205)758-4499 Fax (205)758-4896

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Complaints must be in writing and sent by email. Farley's will acknowledge the complaint as soon as practical, and will provide an initial response to the complaint within two weeks.

Farley's will assess each complaint and determine whether it is substantial. If so the company will attempt to resolve the complaint directly with the person or organization that filed it. If the complaint can't be resolved this way then the company will notify the FSC US National Office and the certification body and move to verification. The company will conduct field or office verification within two months.

Any complaints regarding the FSC Risk Assessments or which are determined to be substantial will be forwarded to the appropriate FSC office. While such substantial complaints are pending the precautionary principle will be employed with respect to the continued sourcing of the relevant material, and this approach will be communicated.

If the results of verification show that control measures are needed these will be implemented by the supplier and verified before any affected material is included in the controlled wood program.

Farley's will inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution.

Farley's Central Office Management Representative is responsible for maintaining copies of relevant correspondence; and recording and filing all complaints received and actions taken.

**End of Summary of DDS for Public Distribution.
The remaining portions of this document (FFP-DP-02) are confidential.**