

## Public Notification Letter

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

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To: Interested Parties

From: SCS Global Services

Consultation period: 04.24.24 – 06.05.24

Re: Notification of intent to audit **BPM Lumber, LLC** 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 BPM Lumber, LLC 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).

## Publically Available Information for FSC Controlled Wood Certificate Holders

### INSTRUCTIONS

FSC® requires that organizations track their controlled material and publish specific findings. This form helps you meet the requirements in Section 6 of FSC-STD-40-005 V3-0 "Publically Available Information".<sup>1</sup>

<b>Organization Name</b>	BPM Lumber, LLC
<b>FSC COC Certificate Number</b>	SCS-COC-002673

<b>Name of Authorized Representative</b> (Contact information for person or position responsible for addressing complaints)	Complaints along with evidence may be submitted to: Kevin Black, FSC COC / CW Administrator BPM Lumber, LLC P.O. Box 2800 London, KY 40743 606-877-1228 Phone 606-877-1230 Fax
<b>Procedure for filing complaints</b> <i>Note: for further details on complaints procedure, see section 7 in FSC-STD-40-005 V3-0</i>	BPM Controlled Wood Complaints Mechanism Complaints supported by evidence related to vendors of controlled wood will be assessed by the Administrator within 2 weeks of receipt. In the event that evidence is considered relevant, field verification will be conducted within 2 months of receipt of the complaint. Field verifications will be conducted by personnel with sufficient expertise and knowledge to be able to conduct the verification in accordance to standard FSC-STD-40-005 V3-1.  If the field verification concludes that the wood does not meet the requirements of FSC Controlled Wood standard Annex 3, or if the field verification is not conducted within 2 months of receipt of the complaint, then the supply will be excluded from BPM's FSC Product Groups and no claims

<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.

	<p>about this material will be made until the supply has been proven to comply with the FSC Controlled Wood requirements. Furthermore, BPM Lumber will notify SCS of the results of the verification within 2 weeks. Records of all complaints received and actions taken will be kept for a minimum of 5 years and made available to SCS upon request.</p> <p>Kevin Black, BPM FSC COC / CW administrator will:</p> <ul style="list-style-type: none"><li>a) Acknowledge receipt of complaint to SCS.</li><li>b) Inform stakeholder of the complaint procedure and provide an initial response to complaints within a time period of 2 weeks.</li><li>c) Forward complaint related to risk designation to SCS.</li><li>d) Conduct a preliminary assessment for determining 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.</li><li>e) Dialogue with complainant that aims to solve complaints assessed as substantial before further actions are taken.</li><li>f) Forward substantial complaints to SCS and relevant FSC National Office for the supply area within 2 weeks of receipt of the complaint.</li><li>g) Employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending.</li><li>h) Implement a verification process for a complaint assessed as substantial by the organization, within 2 months of their receipt.</li><li>i) Determine the corrective action to be taken and the means to enforce its implementation if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material or vendor/ supplier shall be excluded from BPM's material purchasing.</li><li>j) Verify that corrective action has been taken and whether it is effective.</li></ul>
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	<p>k)Excluding the relevant material and suppliers if no corrective action is taken.</p> <p>l)Inform the complainants, SCS and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution.</p> <p>m)Record and file all complaints received and actions taken. All records related to complaints and including actions taken will be retained for a minimum of five years.</p> <p>Complaints along with evidence may be submitted to: Kevin Black, FSC COC / CW Administrator BPM Lumber, LLC P.O. Box 2800 London, KY 40743 606-877-1228 Phone 606-877-1230 Fax</p>
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## Risk Assessment Summary

In the case that there are multiple risk assessments, copy and paste this table below for each assessment.

<b>Description of Supply Area</b>	<p>BPM will only source hardwood saw logs from these counties, listed below, in the states of Kentucky, North Carolina, Tennessee, Virginia and West Virginia:</p> <p>Anderson, Bell, Breathitt, Buchannon, Campbell, Carter, Casey, Cherokee, Claiborne, Clay, Cocke, Dickenson, Estill, Floyd, Garrad, Grainger, Greene, Hamblen, Hancock, Harlan, Hawkins, Haywood, Jackson, Jefferson Johnson, Knott, Knox, Laurel, Lawrence, Lee, Leslie, Letcher, Lincoln, Madison, Magoffin, McCreary, McDowell, McMinn, Mingo, Mitchell, Morgan, Nicholas, Owsley, Perry, Pike, Powell, Pulaski, Rockcastle, Rowan, Russell, Scott, Smyth, Sullivan, Tazwell, Unicoi, Union, Washington, Wayne, Whitley, Wilkes, Wise, Wolfe &amp; Wythe.</p> <p>BPM's procurement area for Controlled Wood is comprised of the above counties, within the US NRA.</p>
<b>Reference to the applicable Risk Assessment</b>	US NRA

**Submit applicable risk assessment (excluding confidential information) in a separate document**

<b>Risk Designations Summary</b>	<b>Sub-category</b>
For any category not rated as "Low" please fill in control measures by risk assessment indicator	

In order to select a checkbox, "double-click" on the box, and select default value as "checked".

<b>Overall Risk Designation for the Supply Area</b>	<input type="checkbox"/> Unspecified (see below for unspecified risk designations) <input checked="" type="checkbox"/> Low
<b>1. Illegally harvested wood</b> Overall Risk Designation: <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low Control Measures per indicator (if applicable) BPM Conducts Annual Onsite Supplier Verification Visits	1.1 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 1.2 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 1.3 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 1.4 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low
<b>2. Wood harvested in violation of traditional and human rights</b> Overall Risk Designation: <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low Control Measures per indicator (if applicable) BPM Conducts Annual Onsite Supplier Verification Visits	2.1 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.2 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.3 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.4 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.5 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low

<p><b>3. Wood harvested from forests in which high conservation values are threatened by management activities</b>          Overall Risk Designation: <input type="checkbox"/> Unspecified <input type="checkbox"/> Low          Control Measures per indicator (if applicable)          See attached Appendix 1; Category 3 Risk Assessment / Control Measures</p>	<p>3.1 <input type="checkbox"/> Unspecified <input type="checkbox"/> Low</p> <p>3.2 <input type="checkbox"/> Unspecified <input type="checkbox"/> Low</p>
<p><b>4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses</b>          Control Measures (if applicable)          BPM Conducts Annual Onsite Supplier Verification Visits</p>	<p>4.1 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low</p>
<p><b>5. Wood harvested from forests in which genetically modified trees are planted</b>          Control Measures (if applicable)          BPM Conducts Annual Onsite Supplier Verification Visits</p>	<p>5 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low</p>

<b>Stakeholder Consultation Summary</b>	
<input checked="" type="checkbox"/> N/A No stakeholder consultations conducted	
<p><b>Summary of the consultation process(es) performed according to Annex B of FSC-STD-40-005 V3</b></p>	<p><i>Low Risk, None Required</i></p>



## Expert Engagement Summary

N/A No expert engagement conducted

**Information on the engagement of one or more experts in the development of control measures in accordance with Annex C of FSC-STD-40-005 V3**

*Note: For individual experts this includes the names of the experts, their qualifications, their license/registration number (if applicable), and the scope of their services. For publically available expertise, the specific sources of information shall be cited.*

*Low Risk - None Required*

**Summary of Field Verification  
(undertaken as a control measure)**

N/A No field verifications conducted as control measures

**A summary of the organization's findings from field verification undertaken as a control measure, and steps taken by the organization to address identified non conformities where they occurred, unless confidential. The organization shall provide a justification for the exclusion of confidential information.**

*Note: The confidential nature of the information may be determined by the legislation that the organization must be in compliance with. Commercially sensitive information, and the names of individual landholders may be treated as confidential.*

*BPM conducts field and document verifications on approximately 10% of its vendors / suppliers annually to be used as a control measure for determining effectiveness and adequacy of its DDS. During its annual review, BPM will document the scope, dates, and staff involved in the review and will document any cases of the DDS evaluated as being ineffective.*

*From May 1 2023 thru April 30, 2024, BPM Woods Staff have conducted \_\_\_\_, GPS Located Vendor / Supplier, source of origin onsite verifications. This represents more than the 10% sample base that BPM strives for each year. No non-conformities were found or noted in the \_\_\_\_ site verification visits conducted.*

*Therefore, after review, BPM Lumber concludes that its Due Diligence System in place is in conformity with FSC-STD-40-005 V3-1.*

## Appendix 1 to DDS Summary (EXHIBIT K)

### Category 3 Risk Assessment information:

Description of Supply Area	Risk Designation	Risk Assessment
See Exhibit K; Description of Supply Area	<i>Specified Risk was determined for category 3, indicator 3.1 HCV 1 (critical biodiversity) and 3.3 HCV 3 (mixed mesophytic cove sites) for BPM's procurement area.</i>	<i>US National Risk Assessment was use for determining areas of risk.</i>

### Control Measures

Wood harvested in forests where high conservation values are threatened by management activities	<i>3.1 HCV 1 (critical biodiversity) and 3.3 HCV 3 (mixed mesophytic cove sites)</i>	BPM has implemented Control Measure 3.1 and has elected to use the "Education and Training" mitigation option having all loggers supplying non-certified sources to BPM educated on identifying and establishing proper BMPs for Central Appalachian CBA (HCV1) and Mesophytic Cove Sites (HCV3).
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