

A satellite map of North and South America, showing the continents in green and brown, with blue oceans. The map is tilted slightly to the right.

American National Standard for Due Diligence in Procuring/Sourcing Legal Timber

ANS LTDD 1.0 2015

Approved March 17, 2015



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American National Standard for Due Diligence in Procuring/Sourcing Legal Timber

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Abstract

This consensus voluntary Standard serves to document a common understanding of the most suitable internal due diligence quality assurance program for establishing confidence that illegal timber is excluded from the timber supply chain. Entities may choose to self-certify or to engage a third party, with or without ISO/IEC 17065 or ISO/IEC 17021 credentials, to perform an independent audit against the requirements of this Standard.

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FOREWORD

(This Foreword is not a part of the American National Standard for Due Diligence in Procuring/Sourcing Legal Timber, ANS LTDD 1.0 2015)

This American National Standard for Due Diligence in Procuring/Sourcing Legal Timber, ANS LTDD 1.0 2015, is sponsored by the Hardwood Plywood & Veneer Association® (formerly the Hardwood Plywood Manufacturers Association) and developed under the Procedures for Development of American National Standards. This is the first national consensus Standard for providing a quality assurance program to assist in conducting due diligence determination of the legality of timber in global commerce. Conformance to this Standard is intended to encourage the use of wood and wood products.

Consensus for this Standard was achieved by use of the “**ANSI Essential Requirements: Due Process Requirements for American National Standards**” and the ANSI accredited HPVA Procedures for the Development of American National Standards. The following organizations, recognized as having an interest in legal timber and wood products that they purchase or sell and other interested parties, were contacted prior to the approval of this Standard. Inclusion in this list does not necessarily imply that the organization concurred with the proposed Standard as submitted to ANSI.

American Forest & Paper Association	National Alliance of Forest Landowners
American Forest Foundation	National Association of Home Builders
American Hardwood Export Council	National Association of Music Manufacturers
Appalachian Hardwood Manufacturers Association	National Hardwood Lumber Association
ASTM Representative	National Marine Manufacturers Association
Business Industrial Furniture Manufacturers Association	National Retail Federation
Canadian Hardwood Plywood and Veneer Association	National Wood Flooring Association
Composite Panel Association	Purdue University Forest Natural Resources Department
Environmental Investigation Agency	Retail Industry Leaders Association

ForestBased Solutions, LLC	Jason Grant, Forestry Consultant
GreenWoodGlobal Consulting, Ltd	Sustainable Forestry Initiative
GSA	Tropical Forest Foundation
International Wood Products Association	Weyerhaeuser
Kitchen Cabinets Manufacturers Association	World Wildlife Fund

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1. Purpose

The purpose of this Standard is to document the best internal due diligence quality assurance program for establishing confidence that illegal timber is excluded from the timber supply chain. Entities may choose to self-certify or to engage a third party, with or without ISO/IEC17065 or ISO/IEC 17021 credentials, to perform an independent audit against the requirements of this Standard.

2. Scope

This Standard is intended to assist companies in establishing a suitable quality assurance program to significantly reduce the risk of illegal timber and wood products entering their supply chain and to demonstrate the level of due diligence in controlling associated risk.

The scope of this Standard covers importing, exporting, and inter-state commerce of timber and wood products with a North American focus and could have international implications for timber in international commerce.

This Standard is not a chain-of-custody scheme, a legal verification system or sustainability certification. This Standard does not constitute legal advice for due diligence compliance or guarantee that legal authorities will accept conformance to this Standard as an absolute defense to legal enforcement.

The official language of this Standard is English.

3. Definitions

Applicable Law – The statutes, regulations, and binding administrative directives in force in the country of harvest at the time of harvest, that are required by national due diligence schemes to demonstrate legal harvest:

- for timber subject to the EU Timber Regulation (EUTR), these include: rights to harvest timber within legal boundaries; payments for harvest rights and timber including duties related to timber harvesting; stumpage fees; timber harvesting, including environmental and forest legislation including forest management and biodiversity conservation, where directly related to timber harvesting; third parties' legal rights concerning use and tenure that are affected by timber harvesting; and trade and customs, in so far as the forest sector is concerned.

- for timber subject to Australia's law, Illegal Logging Prohibition Act 2012, which aims to reduce the harmful impacts of illegal logging by restricting the importation and sale of illegally logged timber products in Australia. Both importers and processors will be required to comply with due diligence requirements.

- for timber subject to the U.S. Lacey Act which makes it unlawful for any person to import, export, transport, sell, receive, acquire, or purchase any . . . plant taken, possessed, transported or sold in violation of any law, treaty or regulation of the United States or in violation of any Indian tribal law, or any foreign law that regulates the theft of plants and in the exercise of due care should know that the plants were taken unlawfully, and

- for timber in any other jurisdiction or country with legal requirements on illegal timber harvesting, logging, purchase or use.

Certification Number – A numerical tracking and search tool for reference purposes to aid in the determination whether a company and a particular product are correctly identified in the certification scheme.

Chain of Custody (COC) – A system of procedures and documentation that tracks the custodianship of forest materials or wood-based products through all the stages of its life cycle from the forest to the end-use.

Coordinator – That person assigned by the Entity's top management, which may include top management, to maintain the quality control systems according to this Standard.

Country of Harvest – The country from which the timber or the timber embedded in the products was taken or harvested. This definition is to be distinguished from country of origin as defined in 19 CFR 134.1 pertaining to customs regulations and often indicates the last country of manufacture and not the original country of harvest. In some cases, the Country of Harvest may need to be broken down further because of very different legal regimes at the sub-national level.

Distributor – An Entity who stores, sells, or ships goods or commodities to retailers or consumers.

Document Control System – The means for maintaining an organization's documents and records, digital or physical, from the time they are created to their eventual disposal. This may include classifying, storing, securing and destruction of records.

Due Care – The conduct that a reasonable person will exercise in a particular situation to avoid negligence. See the definition of *Reasonable Person Standard* below.

Due Diligence – A risk evaluation system of preventing unnecessary harm to either party involved in a transaction prior to establishing a relationship in the exercise of due care. In order to avoid harm to other persons or their property, the process should also periodically evaluate each relationship as long as a relationship exists. Due diligence is a common element in each Applicable Law referenced in this Standard. There is international legal recognition that a due diligence program encompasses the efforts of a reasonable (informed) person (see definition below) to identify, evaluate, and mitigate risk.

Entity – A business or commercial organization or establishment doing business as a corporation, partnership, sole proprietorship or other enterprise conforming to this Standard. For purposes of the EU Timber Regulation, an entity that places timber or timber products on the EU market for the first time is the Operator.

EU Timber Regulation – The European Union legal requirements which entered into force on December 2, 2010, and as of March 3, 2013, makes it illegal to place illegally harvested timber and timber products on the EU market. See Regulation (EU) No 995/2010 at http://ec.europa.eu/environment/forests/timber_regulation.htm.

Exporter – An Entity who sells goods and services produced in one country into another country for the purpose of sale or distribution.

Fabricator – An Entity other than a Manufacturer (primary/secondary) that builds, constructs, assembles or manufactures finished goods by assembling parts.

Forest Certification Scheme (FCS) – A system for certifying that forests and plantations are being managed according to the principles or criteria of a specified forest management standard.

Forest Management Unit (FMU) – A clearly demarcated area of land covered predominantly by forests and managed to a set of explicit objectives and according to a long-term forest management plan. An FMU may be within a larger concession area.

Forest Owner – An entity or individual having the legal right to possess woodlands and sell the timber thereon.

Illegal Harvesting – Timber that is cut or removed without the required license or in breach of a harvesting license or law. This includes logs that are stolen.

Illegal Logging – Harvesting or trading of logs in violation of relevant national or sub-national laws, or access to forest resources or trade in forest products that is authorized through corrupt practices.

Illegal Logging Prohibition Act of 2012 – Australia’s law addressing illegal timber and the websites for this legislation are at: <http://www.comlaw.gov.au/Details/C2012A00166> and the departmental website about the legislation is at: www.daff.gov.au/illegallogging.

Illegal Timber – Timber that is logged, harvested or traded in violation of Applicable Law.

Illegal Trading – Trade in timber or a product containing timber bought, sold, exported or imported and processed in breach of the laws, including laws implemented under the Convention on International Trade in Endangered Species.

Importer – An Entity who brings in or introduces products from another country for the purpose of sale or commercial sampling.

Lacey Act – U.S. law that provides that it is unlawful for any person to import, export, transport, sell, receive, acquire or purchase any fish or wildlife or plant taken, possessed, transported or sold in violation of any law, treaty or regulation of the United States, state, an Indian tribal or any foreign law that protects plants. (See 16 USC Chapter 53 (16 USC 3371-3378)) In addition, Section 3 of the Act, as amended, makes it unlawful to import certain plants, including plant products, without an import declaration.

Legality Verification – The source of timber has provided the purchaser with proof that, in addition to having a legal right to harvest, the harvesting entity complied with the law when harvesting the timber and that the timber was legally exported or imported.

Manufacturer – An Entity in the business of making goods or articles by hand or by machine for the first time (**primary manufacturer**) or manufactured from something primary or original by coming after the first in a series of processes (**secondary manufacturer**).

Pass-through Contract – An agreement in which a buyer imposes a contractual requirement on its immediate supplier, and requires the immediate supplier to impose the same requirement in turn on its suppliers, etc., progressing up the supply chain.

Discussion – a Pass-through Contract may require the supplier to agree to an independent audit, on mutually agreeable terms and conditions, to ensure the supplier has passed the requirements on to its suppliers. Pass-through Contracts are usually not necessary because buyers have recourse against their direct suppliers for breach of express or implied warranties or other contractual obligations. They may be needed, however, where a buyer wants to impose

an obligation, such as collecting certain information, beyond its immediate supplier but needs to avoid asking its supplier to disclose the identity of its suppliers or other confidential or competitively sensitive information. Third-party certification is an alternative to Pass-through Contracts.

Quality Assurance Program – A system in place to verify and maintain a desired level of quality in a product or process by use of appropriate methods.

Reasonable Person Standard – The degree of care that a person of ordinary prudence, skill, ability, and judgment which, if not met, constitutes negligence. Such a standard may be imposed by contract or by operation of law in the absence of a contract. This term implies the performance of duties and services by a professional that is consistent with the level of performance provided by reputable professionals in the same geographical area at the same period of time and is reasonably commensurate with a known danger and the seriousness of the consequences that are liable to follow its omission. Due care may be either ordinary care or a high degree of care, according to the circumstances of the particular case. Knowledge should be common to everyone in a particular community.

Retailer – An Entity who sells goods or articles directly to consumers.

Standard Business Documentation – Written or digital records frequently used by the relevant industry which may include, but are not limited to: contracts, purchase orders, receipts, invoices, timber sales, transport records, bills of lading, trip tickets, shipping records, import records, customs records, government inspections, standard seals, titles/numbers, reports or audits for the transaction in question.

Timber – The wood of growing trees, including logs, suitable for wood products such as lumber, veneer, chips, shavings, sawdust, bark, pulp, paper and other wood products from these materials excluding recycled wood materials.

Timber Owner – An Entity or individual with the legal right to sell Timber.

Top Management – The individual(s) within an entity who has operational responsibility for legal and regulatory compliance of those operations.

4. Management Program – The Entity shall establish a quality assurance program in order to implement a due diligence program. The key elements of the quality assurance program are a purchasing policy, qualified personnel responsible for the management of the program, infrastructure and control systems, and a document control program.

4.1 System Personnel – The Entity shall designate a competent Coordinator(s) to manage the requirements of this Standard. (See **Appendix A.2**) This may or may not be a full time position. The Coordinator(s) should have the required knowledge and skills necessary to effectively perform the due diligence elements of the standard necessary to achieve the intended results.

4.2 Procurement Policy Statement – The Coordinator shall prepare a procurement policy statement, approved and supported by top management, which should minimally include the following:

4.2.1 Statement as to the scope of the commitment of the company to avoid the knowing purchase or trade in Illegal Timber.

4.2.2 Statement as to the strategy of the company to achieve the goal of purchasing and trading only legal timber.

4.2.3 Statement as to the sources of Illegal Timber that will be avoided or systematically eliminated from the supply chain.

4.2.4 Statement as to the specific actions taken to establish confidence that Illegal Timber is excluded from the timber supply chain or if existing suppliers are noncompliant or uncooperative or illegal timber is found in the supply chain. (See examples in **Appendix A.1 and A.5**)

4.3 Infrastructure and Control Systems – The Coordinator shall establish a quality assurance program to implement the requirements of this Standard (See **Sections 4.0 through 9.0**). The quality and document control systems may be incorporated into a larger audited system used by the Entity, such as ISO 9001 or ISO 14001.

4.3.1 Database of Suppliers and Tree Species – The Coordinator shall maintain a database of suppliers that minimally includes the identification and contact information for direct and, where applicable, indirect suppliers, species handled/supplied, including all component species, Country of Harvest of those species, and, where applicable, certification numbers and licenses, declarations, and other records associated with its timber purchases. The same database shall contain the resulting risk assessment related to that supplier. (See **Section 5.3**)

4.3.2 Database of Country/Region Information – The Coordinator shall maintain a database of Country of Harvest for each of its suppliers, with an

assessment of whether any given country and species growing there are substantially impacted by illegal logging and therefore identified as high risk, using publicly available information. (See **Appendix A.3**) The Coordinator shall stay informed of developments in the relevant Country of Harvest and update the database accordingly.

4.3.3 Current Reference Material – The Coordinator shall maintain current reference material according to the document control system (See **Section 7.0**).

4.4 Document Control System – The Operator shall establish and maintain a document control system to ensure the current status of all documents and references required by this Standard. (See **Section 7.0**)

4.5 Management Review – Review of the quality assurance program shall be performed by the Coordinator at regular intervals to evaluate and report system performance to top management. Management reviews shall include consideration of customer feedback, system performance, nonconformities, audits, and changes needed to improve system effectiveness. Records of management review outcomes shall be kept and include decisions and actions taken for continuous improvement to the quality management system.

5. Risk Assessment Process – Entities shall be responsible for researching available information to perform a risk assessment, at the species level, to determine whether: a) the Country of Harvest is substantially impacted by illegal logging and therefore is at a high risk as a potential source of Illegal Timber, and b) whether harvest or trade in the species requires certain licenses or is otherwise legally restricted. Any purchases from a Country of Harvest designated as high risk or of a legally restricted species will require a heightened level of Due Diligence.

See the summary tables below and the detailed assessment process that follows in this Section 5 and Section 6.

Note: This is a program for assessing risk and exercising due care, largely in advance of purchases. In all cases, however, where an Entity discovers concrete information that a shipment is illegal or a supplier is engaged in illegal activities, the transaction shall be halted and, where appropriate, authorities and relevant certification bodies notified, and appropriate and corrective action taken.

FIGURE 1.0 Due Diligence Risk Evaluation

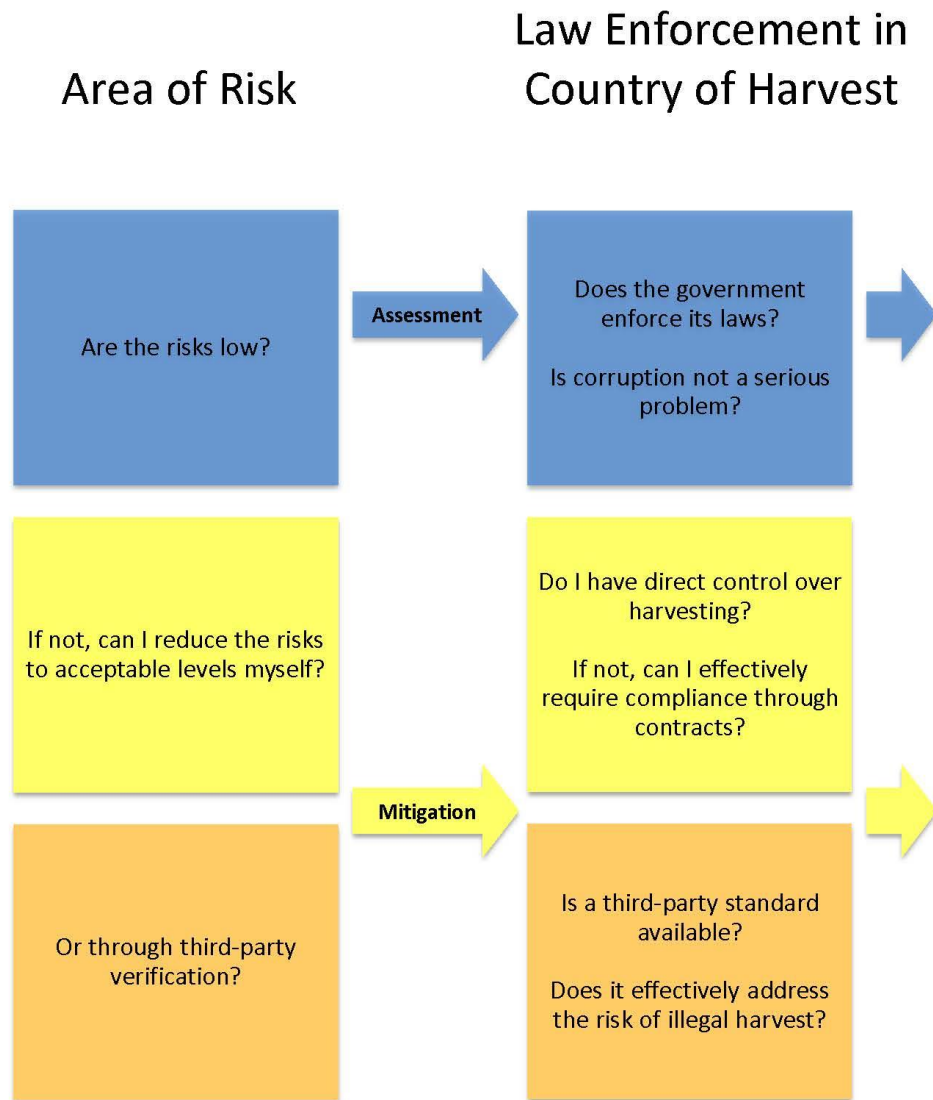
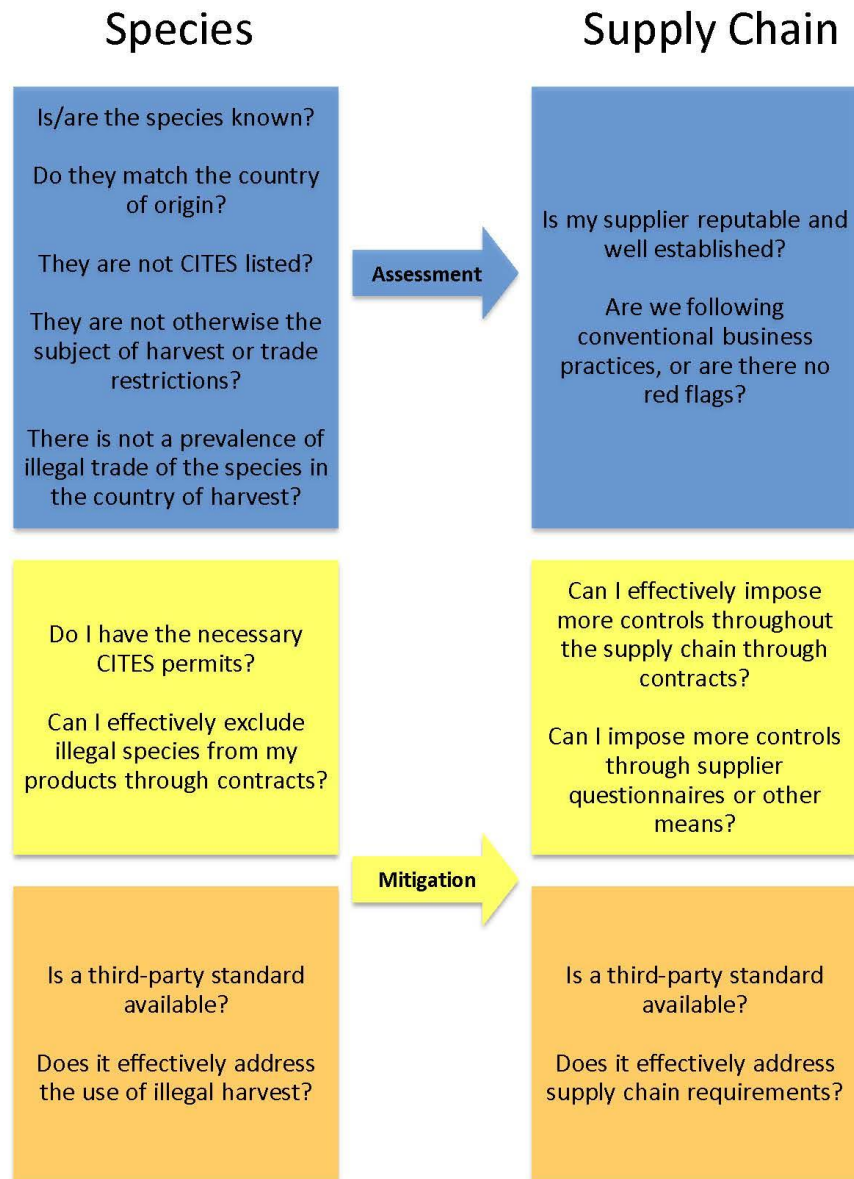


FIGURE 1.0 Due Diligence Risk Evaluation



5.1 Country of Harvest – Determine the Country of Harvest. This may be determined through, for example, information from the supplier, information on labels or grade stamps, customs declarations, or a certificate of origin for the timber. Care should be taken not to assume that the labels and grade stamps are accurate or that a certificate of origin is equivalent to the country of harvest.

5.1.1 Risk Assessment – The Coordinator shall compare the Country of Harvest to the database of countries and evaluate the confidence the Entity has in the governance of that country, identifying as high risk those countries substantially impacted by illegal logging and ineffective at controlling it. The Coordinator shall evaluate governance at the sub-national level for countries in which the risk of illegal logging is not reasonably uniform due to significant differences in governance. In addition, within certain countries otherwise identified as high risk at the national level, the geographic areas that drive the risk may be capable of being identified spatially and isolated. In these cases the Coordinator may conduct a spatial risk assessment and produce a map to assist in decisions to mitigate risk. These determinations and their bases shall be documented. (See **Section 4.3.2**)

5.1.2 Legality Requirements Determination of Country/ Region/ FMU (Concession) – The Coordinator shall make a reasonable inquiry into the Applicable Laws relevant to the species and Country of Harvest in effect at the time of the risk assessment. The Applicable Laws may be cross-referenced against any lists of species handled and supplier lists containing countries of harvest. (See **Appendix A.3**) The Entity may consider engaging a legal review based on the laws of the country performed by local legal counsel with expertise both in forestry and export laws. In instances where legal requirements may be unclear because of conflicting local/national/international laws, the conflict shall be noted with the basis for the determination. The Coordinator shall document and maintain this information. The Applicable Laws shall be reviewed periodically as provided in Section 5.4 unless the inquiry indicates that there is the potential that these laws may be amended sooner, in which case the Coordinator shall inquire as to the status of the changes.

5.1.3 High Risk Countries of Harvest – When an Entity deals with species from Countries of Harvest that cross risk categories, the Coordinator shall use the Due Diligence approach associated with the highest level of risk. (See **Table 1.0**)

5.2 Species Identification – The correct identification of the timber species is an important step. It is necessary, for example, to check compliance with CITES. (See **Appendix A.3**) Where a species is unknown or declared incorrectly (the properties of the wood do not match the declared specie), all reasonably possible species that could be present must be identified. Species groups can be recognized if accepted under Applicable Law (i.e. the latest USDA/APHIS Approved Species Groupings).

Determining the timber species is also critical to determine the potential Countries of Harvest for that/those species. If for a given Country of Harvest a species is not native, or if it is exotic but not grown at a commercial scale, then either the Country of Harvest or the species information must be viewed as suspect, the information reviewed, and the discrepancy resolved. The Coordinator shall document and maintain this information.

5.3 Supply Chain – The Entity shall identify its immediate suppliers and make reasonable inquiries into its entire supply chain to determine their capability to avoid any identified risks of supplying Illegal Timber. Potentially negative factors (“red flags”) such as deep discounts, cash transactions, past illegal activity, police and NGO reports, reputation, or new entrants shall be taken into consideration when evaluating the supplier. Potentially positive factors such as length of time in business, reputation, direct ownership or control over the Forest Management Unit, certifications, site visits, internal training programs, and the supplier’s own due diligence program shall also be considered. The Coordinator shall also review all certifications, licenses, declarations, and compliance claims made by its suppliers. The Coordinator shall document and maintain this information. (See **Appendix A.6**)

5.4 Update – The Coordinator shall update its risk assessment every three years or before its next transaction involving the particular Country of Harvest if later than three years.

5.5 Due Diligence Matrix – The Coordinator shall ensure that the risk assessment steps are carried out for all forest sources included in its timber product(s) and identified risks. The Coordinator shall use the Due Diligence Matrix below to determine into which quadrant the product falls based on its specie and the governance of the Country of Harvest. Within each quadrant the Coordinator shall address the supply chain requirements appropriate to the identified risks.

Table 1. Due Diligence Matrix

		Species-Related Uncertainties (See 5.2)	
		No	Yes
High Risk Country? (See 5.1)	No	<ul style="list-style-type: none"> • Products traced to Country of Harvest* • Basic inquiry of the applicable laws there governing the protection and export of wood • Supplier uses standard business documentation for this level in supply chain • Supplier does not raise red flags • <i>Optional:</i> products with third-party legality verification or forest certification with certified sourcing or chain of custody <p>(See 6.1) A</p>	<ul style="list-style-type: none"> • Products traced to Country of Harvest* • Basic inquiry of the applicable laws there governing the protection and export of wood • Supplier has necessary species-related permits • Supplier uses standard business documentation for this level in supply chain • Supplier does not raise red flags • <i>Optional:</i> products with third-party legality verification or forest certification with chain of custody <p>B (See 6.2)</p>
	Yes	<p>(See 6.3) C</p> <ul style="list-style-type: none"> • Products traced to Forest Management Area • Pass-through contracts with suppliers <i>or</i> products third-party certified with chain of custody • Supplier does not raise red flags • Product third-party legality verification or forest certification with chain of custody 	<p>D (See 6.4)</p> <ul style="list-style-type: none"> • Products traced to Forest Management Area • Supplier has necessary species-related permits • Pass-through contracts with suppliers <i>or</i> products third-party certified with chain of custody • Supplier does not raise red flags • Product third-party legality verification or forest certification with chain of custody

*Or subnational level per 5.1.1

6. Due Diligence Program – Importers and Manufacturers – The timber supply chain is often complex: timber passes through many parties from the standing tree to the log to the intermediate and final product; the intermediate product may be bundled in a variety of ways that disassociate it from the original tree stem.

Importers and primary and secondary manufacturers of wood products are a relatively “early” link in the supply chain and, therefore, provide important due diligence for subsequent users of the timber.

NOTE: Fabricators, distributors and retailers are further down the complex timber supply chain and must rely on the due diligence programs of their suppliers. These Entities may follow the due diligence program elements found in **Appendix A.9** and may supplement with the elements described in this section as deemed necessary.

The Entity shall determine the overall risk of the supply (See **Figure 1** and **Table 1**) and take the following risk reduction measures accordingly.

6.1 Quadrant A Evaluation Elements – If the timber product's evaluation falls within quadrant A, then the risk of the product being Illegal Timber is negligible. The Entity shall take the following steps:

6.1.1 The Coordinator shall obtain the relevant evidence of the legal sale of the timber from the Entity's direct supplier and provide it to its customer(s). This evidence may include: documentation of contract or bill of sale, bill of sale from the landowner which may include checking the first bill of sale, chain of custody, legal timber risk assessments, transportation documentation, or any other relevant evidence reflecting standard business practice.

6.1.2 The Coordinator shall document the identity and address of the Entity's direct supplier and its customers, the species and quantity of timber purchased and sold, and the Country of Harvest and its associated risk assessment. The Coordinator shall maintain a copy of all documentation, including current authoritative analysis of the certainty of legal timber harvesting in the Country of Harvest.

6.1.3 The Entity may, to add certainty to its determination of low risk of the timber supply, determine whether the product is currently certified to a Forest Certification Scheme (FCS), legality verification scheme, or is otherwise categorized as responsible or certified under the ASTM D7612 Standard Practice for Categorizing Wood-Based Products According to Their Fiber Sources (See **Appendix A.4**). This determination shall be verified by checking the certification number on the relevant certification or verification website. The number and verification shall be logged in the supplier database annually. The coordinator

shall conduct periodically, at least annually, a review of legal risk reports of the applicable FCS scheme.

The Entity shall not make claims associated with sustainable forestry certification without first having any corresponding necessary authorizations, such as those associated with a chain-of-custody certificate, required by the certification scheme.

6.2 Quadrant B Evaluation Elements – If the timber product's evaluation falls within quadrant B, then some additional due diligence is required to avoid the risk associated with the species. In addition to all the requirements of 6.1, the Entity shall take the following steps:

6.2.1 The Coordinator shall ensure that any necessary paperwork for species on CITES list Appendices II or III or partially protected by national law is in order and authentic.

6.2.2 FCS or Legality Verification (See **Section 6.1.3**). If the Entity uses a Forest Certification Scheme or legality verification to address species risk, it shall require a valid Chain of Custody certificate or a certified sourcing certificate.

6.3 Quadrant C Evaluation Elements – If the timber product's evaluation falls within quadrant C, then more due diligence is required to avoid the risk associated with weak governance in the Country of Harvest. The Entity shall take the following steps:

6.3.1 Questionnaire – The Coordinator shall collect a questionnaire and legality declaration (See **Appendices A.5** and **A.8**) from the supplier on an annual basis. When the supplier is merely an intermediary between the forest/mill and the Entity, every effort should be made to ensure that the forest/mill is answering the questionnaire directly. (See **Appendix A.6**)

6.3.2 Due Diligence Procedure

6.3.2.1 Evidence of Legality – The Coordinator shall request all or some of the following documents as evidence of legality:

- Logging permit
- List/map with the valid concession or harvest title
- Forest Management Plan approval as well as any additional documents according to applicable legal requirements. (See **Section 5.1.2**)

6.3.2.2 Supplier Engagement – The Coordinator shall engage the supplier in an audit procedure by paper or on-site of the legal right to harvest and the legal compliance of the harvest. To validate the legal right to harvest, the Coordinator may collect:

- The position of the known source forest on a map
- The harvesting/logging permit and authorization of forest owner or concession licensee.

6.3.2.3 Validation of Legal Compliance – To validate the legal compliance of the harvest, the Coordinator may collect:

- Approved management plan or equivalent consulting forester best management plan
- Specification of applicable harvesting restrictions
- Evidence (maps/records) showing harvesting from the designated harvest area
- Records showing yield figures, volumes and species for evidence of harvesting rate compliance
- Professional harvest certificate
- Sales and purchase contracts
- Evidence of fee payment for harvesting
- Evidence of compliance with harvesting permit/contract
- Current list of species harvested (to compare with CITES)
- Bill of Lading to show compliance with timber transport regulations
- Records and photos to show compliance with harvesting with, for example:
 - water protection zones
 - skid trails
 - stream crossings or conduct audits.

Any evidence of a significant dispute over the right to harvest shall be investigated and, if appropriate, purchases put on hold until the dispute is satisfactorily resolved. Determinations shall be documented in every case.

The Coordinator shall be competent to identify evidence of fraud and other falsehoods in the documents (See **Appendix A.6**).

6.3.3 Where it is not feasible, due to complexity of the supply chain, to collect the documents required by Section 6.3.2, and none of the exclusionary factors listed below are present, then the questionnaire and legality declaration shall serve as a part of the commercial representation between the supplier and the Entity.

If any of the following exclusionary factors are present, the timber shall be excluded from the supply chain:

- Reasonable suspicion that timber originates from Protected Areas, national parks or other illegal sources
- Species on CITES list Appendix I
- Species on CITES list Appendices II or III or partially protected by national law without the compliant permits.

If any of the following factors are present, the timber may be excluded from the supply chain:

- Timber originating from areas associated with human rights violations, armed conflict or violation of UN sanctions
- Timber from areas where open conflict exists between communities, worker groups, concession managers and/or government forces. (See **Appendix A.3**)

6.3.4 Improvement Programs – The Entity shall develop an improvement program with the supplier including firm targets where necessary. Suppliers who do not cooperate with the audit and any necessary improvement program shall be eliminated from the supply chain.

6.3.5 Pass-through Contracts – If the Entity is an indirect purchaser of timber and/or not in a position to conduct audits directly at the Forest Management Area level (e.g., due to competition law or the need to protect proprietary information or intellectual property), the Entity shall either impose the requirements of this Section 6 up the supply chain through Pass-Through Contracts or require that the timber products are independently certified with chain of custody (see **Section 6.2.2**). Pass through Contracts should be periodically audited.

6.3.6 FCS or Legality Verification (See **Section 6.1.3**) – Chain of Custody is required.

6.4 Quadrant D Evaluation Elements – If the timber product's evaluation falls within quadrant D, then a high level of due diligence is required to avoid the risk associated with weak governance in the Country of Harvest and the risk associated with the species. The Entity shall take the following steps:

6.4.1 Questionnaire (See **Section 6.3.1**) – When the supplier is merely an intermediary between the forest/mill and the Entity, every effort should be made to ensure that the forest/mill is answering the questionnaire directly.

6.4.2 CITES Check (See **Section 6.2.1**)

6.4.3 Due Diligence Procedure (See **Section 6.3.2-3**) – Audits shall include on-site, in-country reviews of compliance. The Entity may hire a qualified third-party to perform this function.

6.4.4 Improvement Programs (See **Section 6.3.4**)

6.4.5 Pass-through Contracts with Suppliers (See **Section 6.3.5**)

6.4.6 FCS or Legality Verification (See **Section 6.3.6**) – Chain of Custody is required.

7. Establishment of a Document Control Program – A document control program shall be established which includes document retention and renewal policy, confidentiality policy, control procedures and improvement programs as needed.

7.1 Document Retention and Renewal – A document control program shall be written that instructs the Coordinator in retaining and renewing documents according to their type.

7.1.1 Financial Records – Existing financial records systems including purchase orders, invoices and payment records should be part of the program especially to the extent they provide information on the identity of suppliers, species and countries of origin of timber and timber products.

7.1.2 Questionnaires – Initial or renewed questionnaires shall be required of all suppliers who provide new product(s); products where country of origin and country of harvest differ and chain of custody in a forest certification scheme is not provided. Information requested may include the name and address of the supplier, timber origin, common and scientific name of the species, and the quantity (volume, weight, or number of units).

7.1.3 Timetables – Timetables shall be developed by the operator establishing the frequency for updating questionnaires based on supplier risk categories. Timetables shall include requirements for acceptable response period from the time a questionnaire is issued.

7.2 Confidentiality – Confidentiality agreements may be part of each questionnaire.

7.3 Control Procedures – Control procedures, including supplier audits, shall be relevant to the risk. The rigor of verification procedures (document audits or on-the-ground audits) shall correspond to the degree of risk that the supplier may be trading in Illegal Timber. In order to reduce or eliminate risk in the Operator's supply chain, the audits may be tailored to the specific timber management related risk of the country or region of origin or tree species.

7.4 Improvement Programs – The Operator shall require supplier developed improvement programs to remediate gaps in supply chain management or deficiencies identified through supplier questionnaires and/or audits. Any targets or objectives established in an improvement program should be specific, measurable, achievable, realistic and time-bound. Mitigation must be adequate and proportionate to minimize the identified risk. Progressive follow-up inspections may be required and consequences, including removal from the list of approved suppliers, shall be included in the program. The Coordinator should document all stages of each supplier's individual improvement program.

8. Inspection, Verification and Audit Procedures – The Coordinator shall develop and maintain a quality management system for this program documenting an annual report of all suppliers' progress toward objectives and targets, as well as an annual report of the Entities' progress toward its internal objectives and targets. Procedures followed shall be documented through implementation of an audit program as described in Sections 8.1, 8.2 and 8.3.

8.1 Internal Audits – Self audits may be conducted on a periodic basis, documenting that each component of the quality system was thoroughly reviewed and that the quality system is operating according to the required specifications. Corrective actions to address deficiencies must be identified and implemented.

8.2 Third (3rd) Party Audits – Audits may be conducted by 3rd parties who have knowledge and expertise in forest certification and/or chain of custody management systems.

8.3 Accredited 3rd Party Audits – Audits may be conducted by accredited 3rd party bodies operating ISO/IEC Guide 65 (ISO/IEC 17065) product certification programs and ISO/IEC 17021 management systems certification programs for this Standard.



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APPENDICES

The following Appendices are not a part of the American National Standard for Due Diligence in Procuring/Sourcing Legal Timber and are therefore not binding for this Standard but are included for information purposes only.

A.1 Policy Statement

Background

The United States Congress passed an amendment to the Lacey Act in 2008 which impacts the importation and interstate sale of wood and other plant products in an effort to combat illegal logging. These amendments subject violators to severe criminal and civil penalties which may include imprisonment. The legislation provides that individuals and companies shall not “import, export, transport, sell, receive, acquire or purchase” any plant (including wood and wood products) that has been illegally removed from its place of origin. It applies to all species of wood.

The European Union’s Timber Regulation went into force on December 2, 2010 and will also make it illegal to place illegally harvested timber and timber products on the EU market effective March 3, 2013.

The Japanese government has implemented a policy to prevent the government purchase and use of wood materials harvested illegally. The system requires confirmation that the timber is from legally harvested forests. Effective July 1, 2006, any wood products purchased in Japan will have to hold certification issued by groups such as environmental non-government organizations (ENGOS) or Japanese timber organizations, proving that the wood was harvested legally.

Australia has passed a similar law requiring trade in legally harvested timber and timber products in Australia.

These laws have common characteristics. In general, they:

- Prohibit all trade in timber and wood products that are illegally sourced
- Require importers or other designated entity to declare the origin and species name of *all* wood contained in their products
- Require due diligence or due care
- Establish penalties for violation of the law

These laws can apply to every person and company involved in the interstate and international commerce of wood products. Manufacturers, importers, distributors, retailers, contractors and even individuals must comply with these new rules of business. It is important to note that the Lacey Act and the E.U. Timber Regulation provide some enforcement relief for persons and companies who exercise “due care” in verifying that wood is legally harvested.

Model Policy Statement

(NAME OF COMPANY) is firmly committed to the legal trade of wood products. As such, we expect the same commitment from our suppliers. We will not knowingly purchase or use wood, wood fiber or products for distribution that originate from illegal logging.

To implement these legal requirements, we have contacted all of our associated suppliers and verified the materials sourced are in compliance with applicable legal wood standards. (NAME OF COMPANY) is committed to making best efforts to identify the sources of wood used in the manufacture and sale of our products but recognizes the difficulty in achieving 100% certainty. We expect the complete cooperation and responsiveness from each of our suppliers.

A.2 Relevant Industry Standards to Maintain Coordinator Competency – There should be a written procedure that describes how training and qualification of personnel are determined, delivered, and documented. It should define the requirements for the identification and delivery of necessary training to meet the requirements of Sections 4.0 and 5.0 of the American National Standard for Due Diligence in Procuring/Sourcing Legal Timber.

The Operator's top management supervising the Coordinator should be responsible for:

- Maintaining a list of individuals authorized to perform specific inspections, requests and analyses
- Identifying skills or tasks that require training
- Maintaining a list of operations and activities that require training
- Establishing training requirements for each procedure and work instruction requiring training
- Determining the content of training sessions
- Establishing and maintaining training schedules to ensure that employee training is current.

The Operator's top management supervising the Coordinator is responsible for establishing and maintaining a training schedule and training records with respect to the Quality Manual and Quality Procedures.

Training should include sessions addressing all aspects of the Due Diligence Management System including the quality policy, quality manual, quality procedures, inspection and conducting risk assessments, information solicitation methods, work instructions and records. Training and orientation of newly hired employees should include the subjects in Sections 5.0 and 6.0 within thirty days of the hire date.

Technical proficiencies for inspections, risk assessments and information solicitation performed as part of the quality system should be determined and documented by the Operator's top management supervising the Coordinator. Satisfactory completion of training may be evidenced by use of written "open book" tests, verbal tests or demonstrations of competence witnessed and attested by the Operator's top management supervising the Coordinator.

Each employee performing risk assessment and due diligence should demonstrate proficiency in the requirements on some periodic basis. Records of individual proficiency should be maintained. A records retention policy should also be established. Quality system training content and frequency is based upon Operator's top management supervising the Coordinator's recommendations to meet the objectives of the due diligence quality system.

REFERENCES

ISO/IEC 17065, par. 6.1.2 and A.3

ISO/IEC 17021, par 3.3 and Annex C

A.3 Resources for Country Risk Assessments

Central Point of Expertise for Timber Procurement maintains lists of UN Sanctions against timber producing countries. It also indicates the status of countries with the EU FLEGT Voluntary Partnership Agreements (full implementation, development, negotiation, information).

www.cpet.org.uk/eutr

Chatham House features Consumer Country Policy initiatives including the status of EU FLEGTVPAs. See also “Illegal Logging and Related Trade: Indicators of the Global Response,” July 2010, Sam Lawson, Larry MacFaul, Chatham House (data from 2006 -2009).

<http://www.chathamhouse.org/publications/papers/view/109398>

CITES List Annex I, II, and III

[Appendices I, II, and III](#) to the Convention are lists of species afforded different levels or types of protection from over-exploitation. The CITES Trade Database, managed by [UNEP-WCMC](#) on behalf of the CITES Secretariat, is a unique resource and currently holds more than 10 million records of trade in wildlife and 50,000 scientific names of taxa listed by CITES. Currently, more than 750,000 records of trade in CITES-listed species of wildlife are reported annually.

<http://www.cites.org/eng/app/index.php>; <http://www.cites.org/eng/resources/species.html>

Endangered Species Act

<http://www.fws.gov/endangered/laws-policies/> and <http://plants.usda.gov/java/threat>

Forest Legality Alliance provides a simple, interactive online risk assessment tool developed by the Tropical Timber Action Plan that outlines four steps to help companies assess their risk of inadvertently buying illegally produced timber products.

<http://www.forestlegality.org/risk-tool>

Freedom House

www.FreedomHouse.org

Heritage Foundation publishes an Economic Freedom Index.

<http://www.heritage.org/index/>

Illegal-logging.info is a website which provides information on the key issues in the debate around illegal logging and the trade in illegal timber, via news stories and key documents, as well as details of relevant events and links to other relevant websites. Funded by UKaid from the Department for International Development with additional support from the European Forest Institute's EU FLEGT Facility. The EU FLEGT Facility is funded by the European Union, the Governments of Finland, France, Germany, the Netherlands, United Kingdom and the European Forest.

<http://www.illegal-logging.info/index.php>

Interpol

<http://www.interpol.int/Crime-areas/Environmental-crime/Projects/Project-Leaf>

The Global Forest Registry maintained by the Forest Stewardship Council is a free source of information on the risk of sourcing controversial timber throughout the world.

<http://www.globalforestregistry.org/map>

TRAFFIC

<http://www.traffic.org>

Transparency International provides a website for the Corruption Perception Index with scores conducted on an annual basis by Transparency International.

<http://cpi.transparency.org/cpi2011/results/>

United Nations Environmental Program

<http://www.unep.org/search.asp?sa.x=4&sa.y=5&q=illigal+logging&cx=007059379654755265211%3Ajkngxjgnyii&cof=forid%3A11>

United Nations Economic Commission for Europe

http://www.unece.lsu.edu/responsible_trade/documents/2003-2006/rt03_037.pdf (Illegal Logging and Global Wood Markets: The Competitive Impacts on the U.S. Wood Products Industry)

United Nations Security Council Resolutions

<http://www.un.org/en/sc/documents/resolutions/>

United States Treasury, Office of Foreign Assets Control, Resource Center, Sanctions Programs

<http://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>

World Bank

www.Worldbank.org/governance

A.4 Sustainable Forest Certification, 3rd Party Legality Verification Programs and Other Standard Practices and Resources

ASTM D7612-10: Standard Practice for Categorizing Wood and Wood-Based Products According to Their Fiber Sources

www.astm.org

American Tree Farm System

<http://www.treefarmssystem.org/>

Australian Forest Certification Scheme

<http://www.foreststandard.org.au/>

Austrian Forest Certification Scheme

<http://www.pefc.at/>

Belgian Forest Certification Scheme

<http://www.ecolabelindex.com/ecolabel/woodnet-forest-certification-scheme-belgium>

Canadian Standards Association (CSA Z809) Sustainable Forest Management Standard

http://www.csa-international.org/product_areas/forest_products_marking/Default.asp?language=english

CertforChile Forest Certification Corporation

<http://www.pefc.org/component/pefcnationalmembers/?view=pefcnationalmembers&Itemid=48/42-Chile>

Czech Forest Certification Scheme

<http://www.pefc.cz/>

Danish Forest Certification Scheme

<http://www.pefc.dk/>

Finnish Forest Certification Scheme

<http://forestportal.efi.int/view.php?id=403&c=FI>

Forest Stewardship Council

<http://www.fsc.org/>

French Forest Certification Scheme

<http://www.pefc-france.org/>

German Forest Certification Scheme

<http://consultations.pefc.org/consult.ti/GermanFCS/consultationHome>

Italian Forest Certification Scheme

<http://www.pefc.it/>

Latvian Forest Certification Scheme

<http://www.latvianwood.lv/default.aspx?tabid=2&id=2363&lang=2>

Lembaga Ekolabel Indonesia (LEI)

<http://www.lei.or.id/>

Malaysian Timber Certification Council

<http://www.mtcc.com.my/>

Malaysian Timber Certification Scheme (MTCS)

<http://www.mtcc.com.my/>

National Wood Flooring Association: Responsible Procurement Program

<http://www.nwfa.org/member/rpp.aspx>

Norwegian Forest Certification Scheme and Living Forest Standard

<http://www.pefcnorge.org/>

OLB (Origine et Légalité du Bois)

<http://www.groupesefac.com/fra/?p=757>

PAFC Gabon (Pan African Forest Certification System)

http://madera.fordaq.com/fordaq/news/PAFC-Gabon-Certification_724.html?Printable=yes

Portuguese Forest Certification Scheme

<http://www.pefc.pt/>

Programme for the Endorsement of Forest Certification

<http://www.pefc.org/>

Rainforest Alliance Timber Legality Verification

<http://www.rainforest-alliance.org/forestry/verification/legal>

SmartwoodVLO (Verified Legal Origin)

<http://www.rainforest-alliance.org/forestry/certification/>

Spanish Forest Certification Scheme

<http://www.pefc.es/>

Sustainable Forestry Initiative

<http://www.sfiprogram.org/>

Swedish Forest Certification Scheme

<http://www.pefc.se/>

Swiss “Q-Label Holz” Scheme

<http://www.pefc.ch/>

Timber Legality and Traceability Verification

<http://www.proforest.net/objects/publications/review-of-timber-legality-verification-schemes>

Timber Trade Federation

http://www.ttf.co.uk/Environment/Third_Party_Schemes.aspx

Tropical Forest Foundation (TFF)

http://www.tropicalforestfoundation.org/images/PDF/tff_standard_for_reduced_impact_logging.pdf

U.K. Scheme for Sustainable Forest Management

<http://www.pefc.co.uk/>

World Wildlife Fund Global Forest Trade Network

<http://worldwildlife.org/initiatives/global-forest-trade-network>

A.5 Examples of Supplier Questionnaire and Check List

The GFTN Guide to Legal and Responsible Sourcing, World Wildlife Fund

<http://sourcing.gftn.panda.org/index.php?id=20>

<http://sourcing.gftn.panda.org/index.php?id=59#questionnaires>

http://sourcing.gftn.panda.org/files/PDF/Example_Questionnaire_1.pdf

Example

It is (Company Name) policy to ensure we and our suppliers of timber and wood products are legally harvested and comply with all applicable laws for legal harvesting. We will not knowingly purchase or use wood, wood fiber or products for distribution that originate from illegal logging. To implement the Lacey Act amendments, we are contacting all of our associated suppliers to verify the materials sourced are in compliance with Lacey act standards.

The following table lists the wood species and their countries of origin:

Wood Species

Name of Country

(Name of Company) has also instituted a due diligence program to comply with the Lacey Act requirements. If it is demonstrated that we have been supplied wood that has been illegally sourced, we will promptly take appropriate actions, including stopping purchases from such sources for products covered by this policy.

(Name of Company) is committed to making the best efforts to identify the sources of wood in compliance with the Lacey Act.

A.6 Examples of High Risk Supplies

- Goods significantly sold below going market rate
- Cash only/lower price for goods without paperwork
- Paperwork facially invalid or otherwise suspect
- Unusual sales methods or practices
- Transactions fit the description of illegal transactions discussed in trade/industry publications
- Inability of suppliers to provide rational answers to routine questions
- Bills of lading that exceed the timber allowances in the relevant permit
- Documents that do not have matching PO numbers or some other identifier that is consistent

Sample Checklist Questions from the U.S. Department of Justice

1. Does supplier have long standing relationship with the supplier/s (exporter) of this product?
How long?
2. Does the supplier/s of this supplier buy this product from “spot markets”?
3. Does supplier regularly question their suppliers regarding the origin of this product?
4. Did supplier provide you with all required documentation?
 - a. For non-high risk countries, a written and signed document from supplier identifying companies included in the full supply chain of the product back to the harvesting Entity/ies, including name and location of the harvesting Entity/ies and Forest Management Unit.
 - b. A list of supplying companies harvesting wood from source forests and copies of the association harvesting permits for supplied product and/or other form of authorization from the forest owner, including, for example:
 - c. Species, district of origin information and any other related harvesting or purchasing agreements.
 - d. Evidence of compliance with timber transportation documents: Copies of transport or sales permits with specification of species and volumes as applicable.

5. Have you reviewed the documents and verified that they meet the due diligence requirements?
6. Is there any reason for supplier to believe that paperwork from their suppliers may not be authentic for this product?
7. Is there a ban on exports from this region/country?
8. Have you checked on approved species/products with State/Province for that supplier?, (etc.)
9. Have you retained copies of required documentation?
10. Is this supplier sourcing from a high risk country?
11. If yes, verify that additional required procedures were followed, e.g.,
 - a. product is certified against a Chain of Custody or Traceability Standard,
 - b. the supplier certificate is valid and the scope includes the product supplied,
 - c. the product has been traced along an unbroken and verified chain of custody from the purchaser back to the source entirely by obtaining supplier certification codes on documentation for that product down to forest level, and
 - d. the harvest and export of the species is not restricted or prohibited in the source country.

*Source: U.S. Department of Justice, United States Attorney Middle District of Tennessee,
In Re: Gibson Guitar Corporation, July 27, 2012, Appendix B, Attachment A.*

A.7 Examples of Timber Species References

World Customs Organization, Harmonized Commodity Description and Coding System, Chapter 44, Annex 44 – *Appellation of Certain Tropical Wood Species: Africa and other tropical woods*
<http://www.wcoomd.org>

Wood Handbook: Wood as an Engineering Material, U.S. Forest Service
http://www.fpl.fs.fed.us/documnts/fplgtr/fpl_gtr190.pdf

Tropical Woods of the World, U.S. Forest Service
http://www.fpl.fs.fed.us/research/centers/woodanatomy/techsheets_display.php?geo_category_id=4&genus_commonname_criteria=c&sorting_rule=1a

Manual of the Trees of North America, Charles Sprague Sargent

American Woods, Shelley E. Schoonover

Veneer Species of the World, U.S. Forest Service
http://books.google.com/books/about/Veneer_species_of_the_world.html?id=R2eNF5i5pO4C
<http://www.fpl.fs.fed.us/documnts/fplrp/fplrp167.pdf>

Commercial Foreign Woods on the American Market, David A. Krips

Identifying Wood, R. Bruce Hoadley
www.woodmagazine.com/community/persona/woodworker-biography-r-bruce-hoadley

Timber Monographs, Edmondo Palutan
www.books.google.com/books/about/Timber_Monographs

Wood Database
<http://www.plantsystematics.org/>

Resource on Pacific Island Species
<http://www.agroforestry.net/tti/index.html>

Botanicus Digital Library
<http://www.botanicus.org>

Tariff Information Center of the US Government
<http://www.usitc.gov/tata/index.htm>

35,000 images of hardwoods- images, taxonomy (family or genus names, alphabetically) or keyword

[Inside Wood Library](#)

UN Environmental Programme – World Conservation Monitoring Centre -Species Database

<http://www.unep-wcmc.org/>

A.8 Example of Declaration of Legality and Origin

SELLER HEREBY (REPRESENTS OR OTHER TERM) TO THE BEST OF MY KNOWLEDGE THAT ALL WOOD AND PLANTS, INCLUDING THOSE FROM WHICH THE PRODUCTS MAY BE DERIVED, PURCHASED AND SOLD PURSUANT TO THIS AGREEMENT:

- HAVE BEEN HARVESTED, TAKEN, POSSESSED, TRANSPORTED AND SOLD IN COMPLIANCE WITH ALL LAWS, TREATIES AND REGULATIONS OF THE UNITED STATES AND ANY INDIAN TRIBAL LAW
- HAVE BEEN HARVESTED, TAKEN, ACQUIRED, POSSESSED, TRANSPORTED, SOLD AND PURCHASED IN COMPLIANCE WITH ALL FOREIGN AND STATE LAWS, TREATIES AND REGULATIONS THAT PROTECT OR REGULATE
 - PLANTS AND TREES OR WOOD,
 - THE THEFT OF PLANTS, TREES OR WOOD,
 - THE TAKING OF PLANTS, TREES OR WOOD FROM PARKS, FOREST RESERVES, OFFICIALLY PROTECTED OR OFFICIALLY DESIGNATED AREAS, OR
 - THE TAKING OF PLANTS, TREES OR WOOD WITHOUT, OR CONTRARY TO, REQUIRED AUTHORIZATION; AND
 - HAVE BEEN TAKEN, POSSESSED, TRANSPORTED AND SOLD IN COMPLIANCE WITH ANY LIMITATION UNDER ANY LAW OR REGULATION OF ANY STATE OR UNDER ANY FOREIGN LAW, GOVERNING THE EXPORT OR TRANSSHIPMENT OF PLANTS AND WOOD.

SELLER HEREBY FURTHER (REPRESENTS OR OTHER TERM) TO THE BEST OF MY KNOWLEDGE THAT ALL APPROPRIATE ROYALTIES, TAXES AND STUMPAGE FEES REQUIRED BY ANY LAW OR REGULATION OF ANY STATE OR ANY FOREIGN LAW FOR THE PLANTS AND WOOD, INCLUDING THOSE FROM WHICH THE PRODUCTS MAY BE DERIVED, TAKEN, POSSESSED, TRANSPORTED, PURCHASED AND SOLD PURSUANT TO THIS AGREEMENT HAVE BEEN PAID.

Name:	
Signature	

A.9 Due Diligence Program for Downstream Entities (Fabricators, Distributors and Retailers) – Fabricators, distributors and retailers are further down the complex timber supply chain and must rely on the due diligence programs of their suppliers. Due diligence elements for these entities involve communications with suppliers and evaluation of due diligence systems. Depending on the size and capacity of the fabricator, distributor or retailer, varying degrees of sophistication may be employed to provide greater certainty in the supply chain having exercised due care.

A9.1 Questionnaire and Legality Declaration – The Entity may begin by collecting questionnaires and legality declarations from its wood product suppliers. This may be accomplished by email.

See **Appendix A.5** for examples of questionnaires and **Appendix A.8** for an example of a legality declaration.

A9.2 Risk Assessment Process – The Entity may use the results of the questionnaires and legality declarations to determine whether the supplier has an adequate due diligence program in place to ensure certainty of legality in the supply chain. The Entity may use the Due Diligence Matrix found in Section 5.4 to determine what due diligence procedures might be employed to improve confidence.

A9.3 Quadrant Evaluation Elements – The Entity may then follow the evaluation elements in Section 6.0 of this Standard as relevant to the risk identified.



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*"We would . . . recommend it as a useful
resource for our regulated community."*

Teresa McMaugh, Teresa McMaugh, International Forest Policy & Programs Section, Forestry
Branch, Australian Government Department of Agriculture

*"I am confident that the guidelines will
provide a realistic and pragmatic
approach to due care, that will allow
industry to identify and work with
those producers that are doing it right
and need support!"*

Michael Kearney,

Enforcement Project Manager, National
Measurement Office, EU Timber Regulation

*"Audited compliance with the
ANS LTDD 1.0 will further reassure
customers that Danzer responsibly
delivers legal wood products."*

Cathy Lynn Danzer,

Compliance Counsel, Danzer Holding AG



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