

## Does Veneer Specialties Inc. dba Michigan Veneer Ltd. meet FSC's Controlled Wood standard?

August 12, 2019

We are carrying out an audit of Veneer Specialties Inc. dba Michigan Veneer Ltd. located in St. Johns, Michigan, USA to see if their operations comply with FSC's <u>Controlled Wood</u> standard (FSC-STD-40-005 V3-1). We are writing to you to ask if you know of any reason why their operations would not meet this standard.

Controlled Wood is wood that meets minimum requirements and that can therefore be mixed with FSC wood and used in products with an FSC Mix label. In particular, the wood must not be:

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

We will carry out our audit on September 25, 2019. Here is how you should comment, if you wish to do so:

- When? You should send comments to us before or during the audit.
- How? You can comment by .
  - Meeting with a NEPCon staff member in person.
  - Phone to Naomi Mjelde or Alicia Raimondi, NEPCon staff members from the United States Regional Office. Their phone numbers are Naomi +1 646-863-8714 and Alicia +1 860-942-9024
  - Writing to Naomi Mjelde at 13 Jolina Court Richmond, VT 05477
  - Email to Naomi Mjelde at nmjelde@nepcon.org
  - Fax to Naomi Mjelde at +1 866-438-1971
  - In person by arranging to meet with Naomi Mjelde or Briana Capra
- If you want your comments to be confidential please notify us when you submit the comments.

If you provide comments, we will provide feedback to you within 30 days of the audit.

Veneer Specialties Inc. dba Michigan Veneer Ltd. has written a summary document that lists:

- the risks they have identified that they may source unacceptable wood
- the measures they implement to mitigate those risks.

We have attached this summary document to this letter.

If you wish to dispute any aspect of this forest certification process or the decision we reach as to whether this company meets the Controlled Wood standard, you can access our Dispute Resolution Policy at <a href="https://www.nepcon.org">www.nepcon.org</a>.

Thank you for any help you are able to provide.

If you have any recommendations for contacting other stakeholders that may have an interest in providing comments on this company and audit, we would also gladly receive these from you.

Yours sincerely,

Naomi Mjelde



## **FSC Controlled Wood Due Diligence Summary**

# Michigan Veneer Ltd. in the City of St. Johns, Clinton County, State of Michigan, U.S.A.

### Prepared by Steven L. Wolniakowski on 07/22/19

Description of Supply Area	Risk Designation	Risk Assessment
Hardwood producing states:	P. 1. 14	
Michigan,Wisconsin,Pennsylviana, Ohio,Minnesota,Illinois,Indiana, West Virgina,Alabama,New York,	All supply areas are indicated to be "Low Risk"	All supply areas are indicated in our Company Risk Assessment
Missouri,Virginia,Kentucky,Maine, Iowa,Tennessee,Kansas,Vermont, New Hampshire,Massachusetts,		
Connecticut,Rhode Island,North  Carolina, South Carolina,Gegoria,		
Mississippi,Arkansas,Maryland,Texas, Delaware,New Jersey,Oregon, and		
Washington (except for the Puget Trough Exoregion).		
Hardwood producing areas in Canada:		
New Brunswick, Ontario, and the Great Lakes-St. Lawrence eco-region of Quebec.	All supply areas are indicated to be "Low Risk"	All supply areas are indicated in our Company Risk Assessment

#### 2. Complaints

Procedure for filing complaints

Michigan Veneer will document the procedures to handle comments and complaints for stakeholders that are related to our DDS.

#### The procedure include:

- Acknowledge receipt of the complaint
- Inform stakeholder of the complaint procedure and provide an initial response to the complainant within a time period of (2) weeks
- Forward complaints related to the risk designation in the relevant FSC risk assessment to the responsible body.
- Conduct a preliminary assessment to determine 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.
- Dialogue with complainants that aim to solve the complaint and assess if the complaint is substantial before further actions are taken.
- After assessment of the complaint, if the complaint is determined to be substantial, Michigan Veneer will forward the complaint to our certification body and relevant FSC National Office for the supply area within (2) weeks of the receipt of the complaint. In addition, to the complaint, information will be provided to the certificate body the steps that will be taken by Michigan Veneer in order to resolve the complaint, as well as the precautionary approach will be used.

- Employing a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending
- Michigan Veneer will implement a process either by field verification or desk verification for a complaint that has been assessed to be substantial within (2) months of its receipt.
- Michigan Veneer will determine the corrective action to be taken by its supplier and the means to be used to enforce its implementation by a supplier if the complaint has been assessed and verified as substantial.
   If a corrective action cannot be determined and/or enforced, the relevant material from that supplier shall be excluded by Michigan Veneer.
- If a corrective action can be determined, then Michigan Veneer will verify that the supplier has enforced the corrective action and whether or not it is effective.
- Michigan Veneer will exclude the relevant material and the supplier from our supply chain if no corrective action is taken.
- Michigan Veneer will inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and the actions taken towards its resolution. Michigan Veneer will maintain copies of all relevant correspondence.
- Michigan Veneer will record all complaints received and all actions taken against those complaints.

Contact information of the person or	Contact Person:
position responsible for addressing complaints	Steven L. Wolniakowski
	Email: Stevew@michiganveneer.net
	Phone: 989-224-6187
	Mailing address:
	Michigan Veneer Ltd
	P.O. Box 458
	St. Johns, Mi 48879

Risk category	Indicator (note indicator number and description for each)	Description of CM	
Illegally harvested wood	note: indicate relevant sections of Table A of FSC-STD-40-005 V3, Annex A where applicable.		
Wood harvested in violation of traditional and civil rights			
Wood harvested in forests where high conservation values are threatened by management activities			
Wood harvested in forests being converted to plantations or non-forest use.			
Wood from forests in which genetically modified trees are planted.		``	
Risk of mixing in supply chain	, , , and addition of a contract of the contra		errorman kumaraman (1977) — Million de 19

### 4. Stakeholder Consultation Processes/Summary

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Y None requ	uired (N	lot applicable)			
Name	The second of th	Qualification	License/Registration#	Scope of Service	Source Information
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		Summary – FMU le	vel Location		Subset
None requestions and second se	ired (N	lot applicable)			Subset
None requestions of Foundation	rindings f samp	Iot applicable)  S  ling rate			Subset
None requestions of Foundation	rindings f samp	lot applicable)			Subset

Summary of Findings	
Justification of sampling rate	
Steps Taken to address nonconformities	
Summary of findings not provided due to confidential nature of information	