

# Does Daaquam Lumber Maine, Inc. meet FSC's Controlled Wood standard?

#### 4 February 2020

We are carrying out an audit of Daaquam Lumber Maine, Inc. located in Masardis, Maine 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 March 5 – March 17. 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 Jenna Mueller at +1 620-203-1888
  - Writing to Jenna Mueller at 13 Jolina CT- 2<sup>nd</sup> FL, Richmond, VT 05477 USA.
  - Email to Jenna Mueller at jmueller@nepcon.org
  - In person by arranging to meet with Jenna Mueller.
- 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.

Daaquam Lumber Maine, Inc. 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>.

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,

Jenna Mueller



# FSC Controlled Wood Due Diligence System Public Summary

#### 1. General information

| Organisation name:                                | Daaquam Lumber Maine Inc |
|---|--------------------------|
| FSC certificate code:                             | NC-CW 004825             |
| Organisation's DDS contact person:                | Amos Dean                |
| DDS prepared/assisted by:                         | Prepared by Amos Dean    |
| Date last reviewed/updated (by the organisation): | 2/3/2020                 |

## 2. Suppliers

| Participating site                             | Non-certified<br>material type<br>sourced | Exact number of suppliers | Supplier type(s)  | Average no. of tiers in the supply chains | Approximate or exact number of sub-suppliers |
|--|---|---------------------------|---|---|--|
| Daaquam Lumber Maine Inc.<br>Masardis Division | Logs                                      | 36                        | Forest Management Companies,<br>Brokers without physical<br>possession, Primary Processors. | 3   | 5  |
|  |   |                           |   |   |  |
|  |   |                           |   |   |  |

# 3. Supply areas

| Supply area   | Controlled wood category | Reference to risk assessment used   | Risk designation                |
|---|--------------------------|---|---------------------------------|
| The description should allow the identification of an area with a homogeneous     |                          | If an NRA or CNRA is used, include the document title on FSC Document     | Select the relevant risk        |
| risk designation in the applicable risk assessment for each controlled wood       |                          | Centre. E.g. the title for the CNRA for Poland is "FSC-CNRA-PL V1-1" (see | designation for the supply area |
| category. This is a geographic description (including country of origin) and may  |                          | https://ic.fsc.org/en/document-center/id/238).                            | and controlled wood category    |
| also include a functional scale/source type, where the risk assessment            |                          |   | from the drop-down menu.        |
| differentiates risk based on characteristics such as type of forest (e.g. natural |                          | If a company risk assessment or extended company risk assessment is       |                                 |
| forest or plantation), ownership (e.g. state or private-owned), etc.              |                          | used, write this and refer to the Annex containing the risk assessment.   |                                 |
| Maine, United State of America  | 1                        | FSC-NRA-US V1-0.  | Low risk                        |
|   | 2                        | FSC-NRA-US V1-0.  | Low risk                        |
|   | 3                        | FSC-NRA-US V1-0.  | Low risk                        |
|   | 4                        | FSC-NRA-US V1-0.  | Low risk                        |
|   | 5                        | FSC-NRA-US V1-0.  | Low risk                        |
| New Brunswick, Canada   | 1                        | FSC-NRA-CA V2-0.  | Low risk                        |
|   | 2                        | FSC-NRA-CA V2-0.  | Specified risk                  |
|   | 3                        | FSC-NRA-CA V2-0.  | Specified risk                  |
|   | 4                        | FSC-NRA-CA V2-0.  | Low risk                        |
|   | 5                        | FSC-NRA-CA V2-0.  | Low risk                        |
|   | 1                        |   | Choose an item.                 |
|   | 2                        |   | Choose an item.                 |
|   | 3                        |   | Choose an item.                 |
|   | 4                        |   | Choose an item.                 |
|   | 5                        |   | Choose an item.                 |

# 4. Risk assessment and mitigation

## 4.a Risk mitigation for the origin of the material

Copy the table for each supply area. Add information about control measures for each indicator that is designated **specified or unspecified risk** in the relevant risk assessment (**deleting rows for indicators that are low risk or aren't found in the applicable risk assessment**) and complete the table.

If you only source from low risk areas, delete the table and state "N/A, all supply areas are low risk".

| Supply area:  |   |  |
|---|---|--|
| Indicator   | Control Measures  | Findings from field verification if undertaken as a control measure  |
| Number of the indicators designated specified or unspecified risk in the applicable risk assessment. Note that the number of applicable indicators will change depending on the type of risk assessment used, and not all will be applicable to company risk assessments and 'old' national risk assessments. | Describe the control measures implemented to mitigate the risk and describe their desired outcome.  Describe the activities conducted to verify the effectiveness of the control measures. Include information on the cycle (how often you conduct verification), number of audits, justification of sampling intensity, and the key results of the audits. If you found non-conformities, state steps taken to address them. | Summarise findings, if field verification was conducted.  Describe steps taken to address any non-conformities found, unless confidential.  If information is deemed confidential and not published, provide a justification for this. |
| Controlled wood category 1  | Illegally harvested wood  | <u> </u>   |
| 1.1   | N/A   |  |
| 1.2   | N/A   |  |
| 1.3   | N/A   |  |
| 1.4   | N/A   |  |
| 1.5   | N/A   |  |
| 1.6   | N/A   |  |
| 1.7   | N/A   |  |
| 1.8   | N/A   |  |
| 1.9   | N/A   |  |
| 1.10  | N/A   |  |
| 1.11  | N/A   |  |
| 1.12  | N/A   |  |
| 1.13  | N/A   |  |
| 1.14  | N/A   |  |
| 1.15  | N/A   |  |
| 1.16  | N/A   |  |
| 1.17  | N/A   |  |
| 1.18  | N/A   |  |
| 1.19  | N/A   |  |
| 1.20  | N/A   |  |

| 1.21  | N/A   |  |  |  |
|---|---|--|--|--|
| Controlled wood category 2. Wood harvested in violation of traditional and human rights                                 |   |  |  |  |
| 2.1   | N/A   |  |  |  |
| 2.2   | N/A   |  |  |  |
| 2.3   | Any wood bought from New Brunswick goes through a government owned marketing board which              |  |  |  |
|   | regulates wood harvests and wood sales. The Government puts the entity (not our company) removing the |  |  |  |
|   | forest products in charge of identifying any conflict with indigenous peoples.                        |  |  |  |
| 2.4   | N/A   |  |  |  |
| 2.5   | N/A   |  |  |  |
| Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities |   |  |  |  |
| 3.1   | Avoidance, there are no Caribou in New Brunswick.   |  |  |  |
|   | No SAR are indicated in our sourcing areas of New Brunswick   |  |  |  |
| 3.2   | N/A   |  |  |  |
| 3.3   | N/A   |  |  |  |
| 3.4   | N/A   |  |  |  |
| 3.5   | N/A   |  |  |  |
| 3.6   | N/A   |  |  |  |
| Controlled wood   | category 4. Wood from forests being converted to plantations or non-forest use                        |  |  |  |
| 4.1   | N/A   |  |  |  |
| Controlled wood   | category 5. Wood from forests in which genetically modified trees are planted                         |  |  |  |
| 5.1   | N/A   |  |  |  |

# 4.b Risk assessment and mitigation for mixing in the supply chain

| Participating site           | Supply chain type   | No. of tiers | Risk of mixing | Control measures  | Findings from field verification if<br>undertaken as a control<br>measure             |
|------------------------------|---|--------------|----------------|---|---|
| Daaquam Lumber<br>Maine Inc  | Wood is delivered directly from<br>where it was harvested to our log<br>yard on site.   | 1            | no risk        | Site visits are conducted by our wood procurement manager throughout the contract term to verify locations and specs. | If a risk is found wood deliveries stop immediately until proper action can be taken. |
| Daaquam Lumber<br>Maine Inc. | Wood delivered and purchased directly from concession holder to Organisation's log yard, but purchased through a round wood trader. | 2            | no risk        | Site visits are conducted by our wood procurement manager throughout the contract term to verify locations and specs. | If a risk is found wood deliveries stop immediately until proper action can be taken. |
|                              |   |              |                |   |   |

#### 5. Technical experts used in the development of control measures

List all technical experts used for developing control measures.

N/A, technical experts were not required

#### 6. Stakeholder consultation processes

Summarise all stakeholder consultation processes that you have conducted, including information on:

N/A, stakeholder consultation not required

#### 7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact [Amos Dean, <a href="mailto:amos.dean@daaquam.com">amos.dean@daaquam.com</a>. 207-227-9351. PO Box 749 Ashland, ME 04732] by mail, email, or phone. We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

# Fiber Procurement Complaint Procedure: Revised 02/04/2020

#### 1.0 Purpose:

This procedure is done to deal with fiber complaints that are supported with evidence that are related with our fiber supply of controlled wood being delivered to our Maine mill in Masardis. The purpose for investigating complaints is to keep open relationships with our suppliers and the landowner.

# 2.0 Definition

A written or verbal complaint is an expression of dissatisfaction with our wood procurement policy or certification programs.

#### 3.0 Responsibilities

The procurement manager will be responsible to address and investigate all fiber related complaints.

#### 4.0 Procedure

- All complaints regarding fiber will be addressed within 2 weeks <u>upon receipt of</u> complaint.
- All valid complaints will be investigated and addressed within 2 months of initial filing.
- Corrective action will be taken on all complaints and supplier will be taken off of our supplier list for deliveries immediately.
- For supplier to return he will have to demonstrate that going forward he will only deliver acceptable fiber from reliable sources.
- All records of complaints will be kept on file according to our record retention policy.
- Daaquam Lumber Maine shall notify the complainant and the organization's certification body when the complaint is considered to be addressed and closed.

#### 5.0 Non-Conformance

Any non-conformance in low risk areas shall be brought to the attention of the respective certification body.

# 6.0 Frequent Non-Conformance

Frequent nonconformance with FSC controlled wood requirements in Daaquam's low risk areas will warrant a review of the supply area risk assessment.

# 7.0 Non-Conforming Product Procedure

In case non-conforming products are detected after they have been delivered, the organization shall:

- A) Immediately cease to sell any non-conforming products held in stock;
- B) Identify all relevant customers, and advise those customers in writing within (5) business days and maintain records of the advice;
- C) Analyze causes for occurrence of non-conforming products and implement measures to prevent its re-occurrence;
- D) Notify Daaquam's certification body;
- E) Cooperate with the certification body in order to allow confirmation that appropriate action is taken to correct this non-compliance.

#### Annex - N/A