# Description of the Due Diligence System, including information provided by the organisation according to FSC-STD-40-005 V3-1, Section 6

**1. General information**

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| **Organisation name:** | **Greensaw OÜ** |
| **FSC certificate code:** | **NC-CoC-001234; NC-CW-001234;** |
| **Organisation’s DDS contact person:** | **…., production manager** |
| **DDS prepared/assisted by:** | *DDS prepared by company (production manager …..)* |
| **Date last reviewed/updated (by the organisation):** | **dd.mm.yyyy** |

1. **Suppliers**

*This table should be in line with section 4.b below. A separate risk assessment for mixing shall be provided for each type of the supply chain.*

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| **Organisations / participating sites, supplying area and source types** | **Non-certified material type sourced** | **The exact number of suppliers** | **Supplier type(s)** | **Average no. of tiers in the supply chains** | **The approximate or exact number of sub-suppliers** |
| *Name of organisation’s site. All applicable sites shall be included.*  *Supplying area: the geographical area from which material is sourced: country, county, region, etc.). Source types, as defined in the FSC Risk Assessment like a natural forest, forest plantations, state forest, private forest, community forest, etc.* | *Describe the type of product supplied e.g. logs, sawn logs, chips, wood pulp, etc.* | *Number of suppliers directly supplying material to the site* | *E.g.*  *Forest management enterprise (FME),*  *Broker/trader without physical possession,*  *Primary processor,*  *Secondary processor,*  *Distributor/wholesaler.* | *The average number of organisations within the supply chains, from forest to suppliers.* | *The total number of organisations that are sub-suppliers (indirect suppliers, or suppliers of your direct suppliers) within all supply chains. In general, here should be listed the number of the Forest management enterprise (FME).* |
| **Greensaw OÜ sawmill**  Estonian natural forests,  Estonian uncertified material suppliers, private and state | **roundwood** | **10 FME** | **Forest manager** | **1** |  |
| **Greensaw OÜ sawmill**  Estonian natural forests,  Estonian uncertified material suppliers, private and state | **roundwood** | **7** | **Forest manager, traders without intermediate logyard** | **2-3** | **Ca 10 FME** |
| **Greensaw OÜ sawmill**  Estonian natural forests,  Estonian FSC certified material suppliers, private and state (broken chain) | **lumber** | **1** | **Forest manager, sawmill with logyard** | **2** | **1 FME** |
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1. **Supply areas**

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| --- | --- | --- | --- |
| **Supply area and source types** | **Controlled wood category** | **Reference to risk assessment used,**  **Version, Date** | **Risk designation** |
| *The description should allow the identification of an area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category. This is a geographic description (including country of origin and, if applicable, region and even sub-regions if the DDS is limited) and may also include a functional scale/source type, where the risk assessment differentiates risk based on characteristics such as type of forest (e.g., natural forest or plantation), ownership (e.g., state or private-owned), etc. It should coverer all supplying areas and source types from chapter 2 above.*  *For broken chains, it should be mentioned that it is FSC certified supply area only.* |  | *If an NRA or CNRA is used, include the document title on FSC Document Centre. E.g. the title for the CNRA for Denmark is „* *FSC-CNRA-DK V1-0 EN\_2017-05-18“(see* [*https://fsc.org/en/document-centre/documents/resource/398*](https://fsc.org/en/document-centre/documents/resource/398)*).*  *If an extended company risk assessment is used, write this and refer to the Annex containing the risk assessment.* | *Select the relevant risk designation for the supply area (Low risk or Specified risk) and controlled wood category from the drop-down menu.*  *If the risk is differentiated and the DDS does not include any specified risk areas, Low risk shall be chosen. This is the case when specified risk areas are excluded and the DDS is limited for some regions as described in the first column.*  *For broken chain (FSC certified origin) the risk designation should be chosen as Low risk only.* |
| **Estonia**  Estonian natural forests  Estonian uncertified material suppliers, private and state | 1 | CNRA for Estonia, see <https://connect.fsc.org/document-centre/documents/resource/309>  FSC-CNRA-EE V1-0 EN\_2017-09-20 | Low risk |
| 2 | Specified risk |
| 3 | Specified risk |
| 4 | Low risk |
| 5 | Low risk |
| **Estonia**  Estonian natural forests  Estonian FSC certified material suppliers, private and state (broke chain) | 1 | CNRA for Estonia, see <https://connect.fsc.org/document-centre/documents/resource/309>  FSC-CNRA-EE V1-0 EN\_2017-09-20 | Low risk |
| 2 | Low risk |
| 3 | Low risk |
| 4 | Low risk |
| 5 | Low risk |

**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 risk*** *in the relevant risk assessment (****deleting rows for indicators that are Low risk****) 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****”.*

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| **Supply area and source types:** Estonian natural forests  Estonian uncertified material suppliers, private and state | | |
| **Indicator** | **Control Measures and desired outcome when applicable** | **Organisation’s findings from field verification if undertaken as control measures. Desk evaluation activities should be described** |
| *The number of the indicators designated as Specified risk in the applicable risk assessment.* | *Describe the control measures implemented to mitigate the risk and describe their desired outcome. The desired outcome is compulsory if the organisation develops the control measures. The desired outcome is not needed if the control measures are provided by risk assessment.*  *If control measures are provided by an FSC risk assessment or are publicly available information for categories 2 and 3, expert consultation is not needed. The result of implementing the control measures shall be recorded in the next column.* | *Summarise findings obtained during field verification of suppliers made by the organisation during the audit period. Or describe the activities from the desk evaluation when the control measures are based on a desk review and are not requesting a field verification.*  *Reflect the audit period or timeframe or the number of suppliers controlled. Please provide more detailed information to limit and specify the scope of the DDS evaluated.*  *Describe steps taken to address any non-conformities found, unless confidential.*  *If information is deemed confidential and not published, provide a justification for this.*  *Describe the activities conducted by the Organization to verify the effectiveness of the control measures.*  ***Include:***  *- information on the cycle (how often the organisation conducts verification),*  *- the number of audits,*  *- justification of sampling intensity,*  *- and the key results of the audits.*  *If the Organization finds non-conformities, state steps that are taken to address them.*  *The sampling rate can be applied only for the number of suppliers, the control measures can’t be sampled, and each control measure must be checked for the sampled suppliers.* |
| Controlled wood category 2. Wood harvested in violation of traditional and human rights | | |
| 2.2 | *Specified risk on discrimination of women at work (unequal payment):*  *1- Evidence from suppliers (and their contractors) that they have no men and women working on same position (and same qualification) and for additional information Nr of men and women working in that company. List of contractors with nr of workers. Evidence shall include a signed declaration.*  *2- Interviews with suppliers and/or contractors (protocols shall be kept).*  *Each supplier is evaluated before the first supply and later on once a year. Evaluation process can include review of declarations, visiting companies, interviews with staff of companies (normal workers, and management).*  *If the requirements are not met material will not be accepted.*  *The outcome of these control measures is to eliminate material from companies where there is a pay gap between men and women who do the same work or work of equal value.* | *Describe desk activities implemented.*  *During the reporting period 7 direct suppliers and 3 sub-suppliers workers were interviewed. No signs of wage related discrimination was identified.*  *All 10 suppliers have signed the supplier declaration. Records of supplier declarations and interviews are stored.* |
| Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities | | |
| 3.3 | *Specified risks regarding Natura 2000 sites (forest habitat types listed in the Habitat Directive. On Natura 2000 protection areas), Woodland Key Habitats (WKH), Potential WKHs.*  *Registered WKHs:*  *1-Each supply is controlled from Public forest registry. If material is originating from WKH it is not accepted.*  *Potential WKH:*  *1-Each supply is controlled from potential WKH database sent by FSC Estonia.*  *If material is originating from potential WKH it is not accepted.*  *2-If material is originating from potential WKH but comes together with WKH inventory data stating that the pot WKH was not actually a WKH, together with the reasons why it did not meet the criteria of WKH, then the material can be accepted.*  *Regarding potential WKHs Company has used an expert opinion (guidance to use the database they created) from Expert name to confirm the adequacy of the control measures.*  *Natura 2000 sites:*  *1-Each supply is controlled from NATURA 2000 database.*  *If material is originating from Natura 2000 habitat type it is not accepted.*  *2-If material comes together with Natura inventory data stating that the cutting sub-compartment(s) was not actually a Natura 2000 habitat type and also together with the reasons why it did not meet the criteria of the habitat, then the material can be accepted.*  *Regarding Natura 2000 sites: Company has also asked an expert opinion from Expert Name to confirm the adequacy of the control measures.*  *3-Since WKH databases and Natura 2000 databases mentioned above are not described in EE CNRA as risk mitigation options, they are not considered sufficient to mitigate the risk. Additional field visits are conducted by the organisation to verify that there are no WKHs or Natura habitats outside the areas mentioned in WKH and Natura 2000 databases.*  *Organisation is conducting sample based field visits in sourcing areas before harvesting.*  *Sampling rate used is 0,3xSQRT(nr of FMUs). Each field visit will be protocolled.*  *The outcome of these control measures is to eliminate material from WHKs, potential WKHs and from Natura 2000 habitats.* | *Describe desk activities implemented to check the origin.*  *Company is using DESKIS application that includes WKH, pot WKH, Natura 2000 and Natural sacred ground and cross trees where all felling sites are controlled.*  *During the reporting period and based on random sampling of supply FMUs, 12 FMUs were visited before the harvesting. No WKHs or Natura 2000 habitat types were identified.*  *Protocols are written and stored in the office.* |
| 3.6 | *Specified risk regarding cross trees and Natural sacred grounds:*  *1-Each supply is controlled from cross trees and sacred natural grounds database sent by FSC Estonia.*  *If material is originating from these areas it is not accepted.*  *2-If material is originating from cross trees limited management zone then company must confirm that the forest in this zone is managed according to the instructions sent by FSC Estonia before accepting the material.*  *If material is originating from Natural sacred ground buffer zone but is managed according to instructions sent by the expert then it is ok to accept the material.*  *Company has used an expert opinion(guidance to use the database they created) from Ahto Kaasik (SA Hiite Maja ) to confirm the adequacy of the control measures. For some of the Natral sacred grounds company has used the expert opinion of Heritage Boards Natural Sacred Grounds expert council.*  *3- Since database mentioned above is not described in EE CNRA as risk mitigation options, they are not considered sufficient to mitigate the risk. Additional field visits are conducted by the organisation to verify that there are no natural sacred grounds outside the areas mentioned in the database.*  *Sampling rate used is 0,3xSQRT(nr of FMUs). Each field visit will be protocolled.*  *The outcome of these control measures is to eliminate material from specified risk supplies.* | *Describe desk activities implemented to check the origin.*  *Company is using DESKIS application that includes WKH, pot WKH, Natura 2000 and Natural sacred ground and cross trees where all felling sites are controlled.*  *During the reporting period and based on random sampling of supply FMUs, 12 FMUs were visited before the harvesting. No Natural sacred grounds and cross trees were identified.*  *Protocols are written and stored in the office.* |

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

*This table should be in line with section 2 above. A separate risk assessment for mixing shall be provided for each type of the supply chain.*

*The general rule is that if there is some storage or manufacturing of controlled material by non-certified entities in the supply chain, risk should be designated as ‘****Risk identified’****. Only in cases when products are already labelled (tracing of certified products through non-certified entities in the supply chain) or somehow physically permanently marked (closed and tied packs of sawn timber) the risk may be classified as ‘****No risk identified’****.*

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| **Organisations / participating sites, supplying area and source types** | **Supply chain type** | **No. of tiers** | **Risk of mixing** | **Control measures** | **Organisation’s findings from field verification if undertaken as control measures. Desk evaluation activities should be described** |
| *This table shall be filled for each applicable participating site (listed in the table in Section 2)* | *Describe the supply chain e.g.*  *- Wood delivered and purchased directly from concession holder to organisation’s log yard*  *- Wood delivered and purchased directly from concession holder to organisation’s log yard, but purchased through a round wood trader*  *- Wood delivered from forest to railway terminal and transported by train to Organisation* | *‘Tiers’ indicates the legal entities taking ownership of the wood from harvesting to the organisation purchasing it. If there is only 1 tier, it means that wood is purchased directly from the concession holder.* | *«****Risk identified****»*  *or*  *«****No risk identified****» shall be used only.*  *If a risk is identified, summarise the risk assessment of mixing in this supply chain.*  *In case there is no risk identified, describe why the risk does not exist, provide justification.*  ***Low risk of mixing shall not be used.*** | *If a risk is identified, state what actions are being taken to mitigate that risk. Describe the organisation's activities to verify the effectiveness of the control measures. Include information on the cycle (how often verification is conducted), the number of audits, justification of sampling intensity, and the key results of the audits. If non-conformities were found, state steps taken to address them.*  *For no risk identified, it is not applicable.*  *This information shall also be provided in case of no sourcing of controlled materials during the audit period.* | *This field shall be provided by the organisation and shall not reflect PbN findings.*  *Summarise findings if field verification or desk evaluation was conducted.*  *Describe steps taken to address any non-conformities found, unless confidential.*  *If information is deemed confidential and not published, justify this.*  *For no risk identified, it is not applicable.*  *If no field verification is carried out, but control measures are designed, it should be justified here.* |
| **Greensaw OÜ sawmill**  Estonian natural forests,  Estonian uncertified material suppliers, private and state | Wood delivered and purchased directly from forest owner to Organisation’s log yard | 1 | *No risk*  *Justification: material is moving physically from felling site in forest to company log yard together with waybill that indicates the origin* | N/A | N/A |
| **Greensaw OÜ sawmill**  Estonian natural forests,  Estonian uncertified material suppliers, private and state | Wood delivered directly from forest to Organisation’s log yard, but purchased through a forest manager and/or round wood traders without intermediate logyard. | 2-3 | *No risk*  *Justification: material is moving physically from felling site in forest to company log yard together with waybill that indicates the origin* | N/A | N/A |
| **Greensaw OÜ sawmill**  Estonian natural forests,  Estonian FSC certified material suppliers, private and state (broken chain) | Wood delivered from certified FME to sawmill. Lumber is purchased from uncertified sawmill and delivered to company from sawmill. | 2 | Risk identified | Company is conducting supplier audit to mitigate the risk of mixing and to verify if the material is coming from certified FME and if the origin documentation is correct.  Before starting cooperation with a new supplier of wood, the supplier is obliged to provide a declaration of all places of purchase of the raw material (forest districts)  Suppliers are obliged to inform about the change of the place of raw material purchase and to present a copy of the contract with the Forest Enterprise. | The results of the supplier audit: no issues identified. All origin documents were available and containing FSC claim and code, segregation was implemented, staff was trained and was aware of the requirements. |
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**5. Technical experts used in the development of control measures**

*List all technical experts used for developing control measures. If none were required or used, delete the table and write ”****N/A, technical experts were not required****”.*

*Do not mention the organisation’s experts/staff here, only external experts.*

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| **Name** | **License/Registration #** | **Qualification** | **Scope of service** | **Source of information** |
|  |  |  | *State the relevant supply area(s) and indicator(s) for which expertise was used in the development of control measures* | *For publicly available expertise, provide the citation for the specific source(s) of information used* |
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**6. Stakeholder consultation processes**

***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 [ORGANISATION CONTACT NAME AND CONTACT DETAILS] 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.

*Provide the organisation’s full complaints procedure. The procedure should be copied and pasted from the organisation’s documents/procedure and shall satisfy the requirements of Section 7 of the standard (e.g., at least all points, indicated in Section 7 shall be provided here).*

***Example of the complaints procedure***

1. *The Quality Manager registers stakeholder complaints in the Complaint Register and informs the stakeholder of the receipt.*
2. *Verifies information contained in the complaint, informing stakeholders of the complaint procedure, and providing an initial response to complainants within a time period of two (2) weeks.*
3. *If the complaint relates to a particular risk from the NRA or CNRA, the complaint is forwarded to the responsible body according to the NRA's instructions, for the CNRA - according to the FSC's instructions.*

*NOTE: When a complaint is forwarded to a responsible body, Clauses d) - k) do not apply.*

1. *Conducting a preliminary assessment for determining whether the evidence provided in a complaint is or is not substantial by assessing the evidence provided against the risk of using material from unacceptable sources. If the information contained in the complaint is confirmed, the Quality Manager conducts a field inspection related to this case within 2 months. If the audit reveals non-compliance with the requirements for FSC Controlled Wood, the supplier is given time to correct the non-compliance. If the supplier has not corrected the identified non-compliance within the provided time, the contract with such supplier is terminated.*
2. *Dialogue with complainants that aims to solve complaints assessed as substantial before further actions are taken;*
3. *Forwarding substantial complaints to the certification body and relevant FSC National Office for the supply area within two (2) weeks of receipt of the complaint. Information on the steps to be taken by the organisation to resolve the complaint, as well as how a precautionary approach will be used, shall be included with the complaint;*
4. *Employing a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending;*

*NOTE: This includes a description of how the precautionary approach is employed by the organisation when a complaint is active.*

*NOTE: A complaint is pending if it has been considered to be substantial (according to Clause d), and no effective corrective action (according to Clauses h) - k) has been taken yet.*

1. *Implementing a verification process (e.g. field verification and/or desk verification) for a complaint assessed as substantial by the organisation within two (2) months of their receipt;*
2. *Determining the corrective action to be taken by suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded by the organisation;*
3. *Verifying whether corrective action has been taken by suppliers and whether it is effective;*
4. *Excluding the relevant material and suppliers if no corrective action is taken.*
5. *Informing the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution, and maintaining copies of relevant correspondence;*
6. *Recording and filing all complaints received and actions are taken.*