

# Responsible Sourcing

Presentation to Alaska Board of Forestry

by

Rob Brooks and Associates, LLC

# Rob Brooks

- Wood Industry 1985-2010
  - ASTM D7612 standard
- International Code Council 2011-2012
  - Green Building Programs Director – EPD's, etc.
- Consulting 2013-present
  - U.S. and Canadian Building Codes - Insulation
  - Compliance consulting
  - Advocacy
    - Responsible Source



# John Tokarczyk, Oregon Department of Forestry



# Introduction – <https://responsiblesource.com>

☰ **Responsible Source**  
Going Beyond Legal Compliance

## What is Responsible Source Timber?

**The Current Status of Responsible  
Sourcing**

Approved Forests / Landowners







Sizeable divide between the two



## Market Recognition Sustainable Forestry



Public lands dilemma – picking sides  
Cost / benefit of compliance  
Preference for declaration  
Market recognition of current practice

# Market Expectations

Increasing Value for Transparency

## Consumer

Transparency  
No illegal wood  
Third party  
Available  
Minor Added Value

## State Agencies

Add value to  
timber  
Current practice  
Low disruption  
Declaration

## Producers

Sell - LEED Projects  
Many certified  
Those without  
certification want  
recognition of state  
BMPs

## Federal Procurement

Avoid anti-trust  
FTC marketing  
claims  
Brand neutral  
specification  
Legality

# Answer: Categorization of Existing Programs – ASTM D7612



*Certified* - Voluntary  
rules and enforcement

Beyond  
Responsible



*Responsible* - BMPs,  
enforcement varies

Beyond Legal,  
Enforce existing rules



*Legal* - Federal minimum, all comply

## Category

**Content**

**System  
governance**

**Tracing**

**Verification**

## Certified

**Montreal Process  
Criteria and  
Indicators**

**Consensus  
standard**

**Chain of custody**

**Third party**

## Responsible

**Legal plus BMPs to  
protect water  
quality**

**Consensus  
standard or public  
legislative or  
regulatory  
processes**

**To a certified  
procurement system,  
chain of custody, or  
applicable jurisdiction**

**Third party as required  
by Responsible Official**

## Non- Controversial /Legal

**Not from illegal or  
unauthorized  
harvesting**

**Public legislative or  
regulatory processes if  
low risk under due care  
standard; voluntary  
standards or contracts if  
needed**

**To applicable  
jurisdiction if low risk  
under due care  
standard; beyond if  
needed**

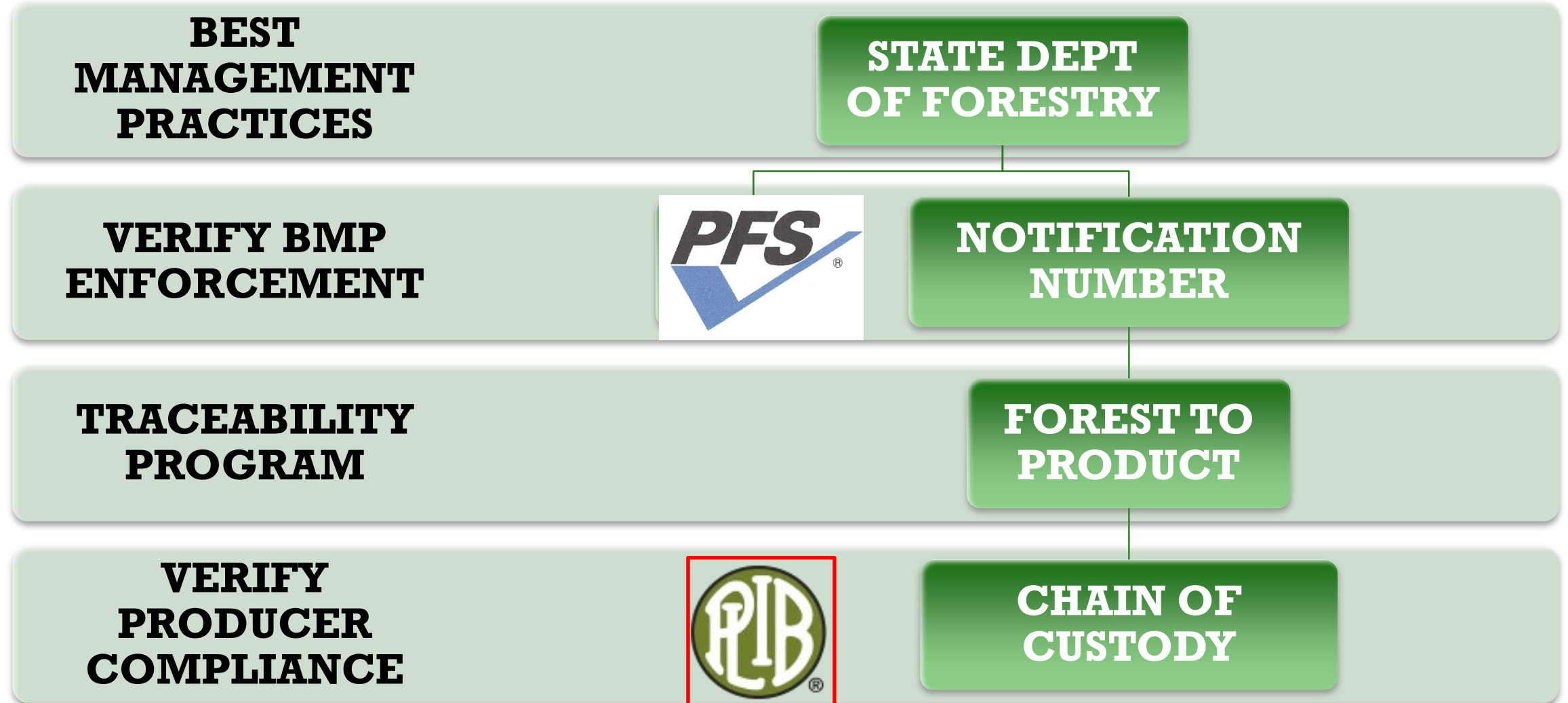
**First party if meets due  
care standard, beyond  
if needed**



<b>Forest Management Program</b>	<b>Traceability Program</b>	<b>Legal Sourcing</b>	<b>Responsible Sourcing</b>	<b>Certified Sourcing (via CoC)</b>
<b>Sustainable Forestry Initiative (SFI)</b>	SFI CoC	Yes	Yes	Yes
<b>American Tree Farm System (ATFS)</b>	SFI CoC or PEFC CoC	Yes	Yes	Yes
<b>Canadian Standards Association (CSA)</b>	SFI CoC or PEFC CoC	Yes	Yes	Yes
<b>Programme for the Endorsement of Forest Certification (PEFC)</b>	PEFC CoC	Yes	Yes	Yes
<b>Forest Stewardship Council (FSC)</b>	FSC CoC	Yes	Yes	Yes

Forest Management Program	Traceability Program	Legal Sourcing	Responsible Sourcing	Certified Sourcing (via CoC)
Private or Public	SFI - Fiber Sourcing Certificate	Yes	Yes	No
Oregon Forest Practices Act	Third-party program per Oregon Traceability Requirements	Yes	Yes	No
Private or Public	PEFC Due Diligence System	Yes	No	No
Private or Public	FSC - controlled wood	Yes	No	No
Federal Management Programs	None	Yes	No	No

# ASTM D7612 Process – Responsible Source



# BMP Audit Requirements in ASTM D7612

- ASTM D7612 does not list specific audit requirements for Requirement E in Table 1, which describes the criteria for substantive content:  
*“Requires compliance with best management practices to protect water quality and ensure all fiber comes from known and legal sources.”*



# Five Audit Essentials for BMP Enforcement

The authors stated that the standard intent was to follow five essential principles:

1. There is a state law with best management practices that requires compliance and punishes non-compliance
2. There is an agency with designated authority to uphold the law
3. There is sufficient funding/staffing within agency to enforce compliance
4. The agency can demonstrate proof of enforcement
5. The agency can prove there is an adaptive management strategy showing continuous improvement

# NASF Classification of BMPs by State - Regulatory

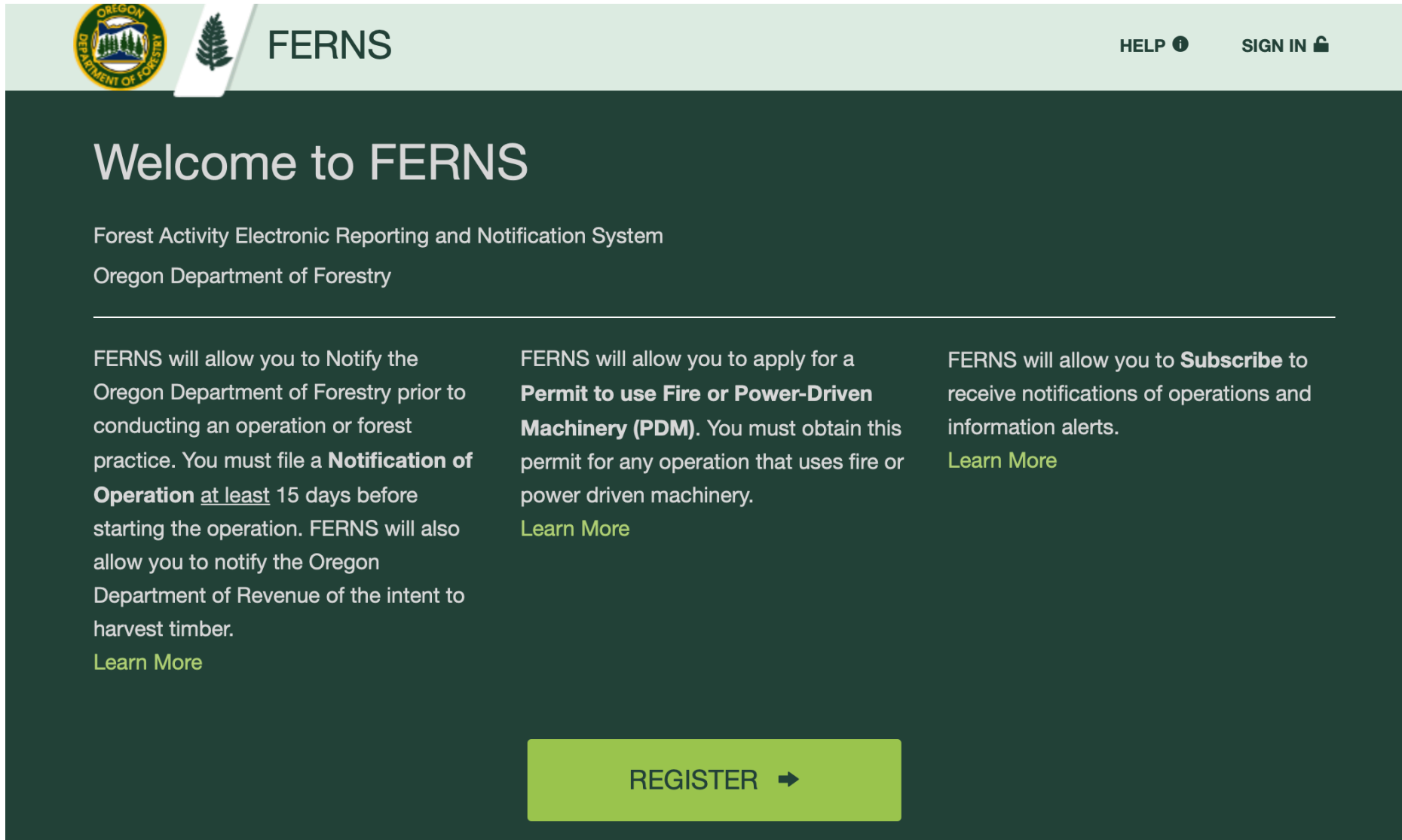
- Alaska 👍
- California
- Idaho
- Kentucky
- Maryland
- Oregon
- Washington
- West Virginia

## Protecting Water Quality through State Forestry Best Management Practices

NATIONAL ASSOCIATION OF STATE FORESTERS



# Notification Number – Key to Traceability



The screenshot shows the top navigation bar of the FERNS website. On the left is the Oregon Department of Forestry logo, which includes a tree and the text 'OREGON DEPARTMENT OF FORESTRY'. To its right is a white banner with a green tree icon and the text 'FERNS'. On the right side of the navigation bar are links for 'HELP' with an information icon and 'SIGN IN' with a lock icon.

## Welcome to FERNS

Forest Activity Electronic Reporting and Notification System  
Oregon Department of Forestry

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FERNS will allow you to Notify the Oregon Department of Forestry prior to conducting an operation or forest practice. You must file a **Notification of Operation** at least 15 days before starting the operation. FERNS will also allow you to notify the Oregon Department of Revenue of the intent to harvest timber.  
[Learn More](#)

FERNS will allow you to apply for a **Permit to use Fire or Power-Driven Machinery (PDM)**. You must obtain this permit for any operation that uses fire or power driven machinery.  
[Learn More](#)

FERNS will allow you to **Subscribe** to receive notifications of operations and information alerts.  
[Learn More](#)

[REGISTER →](#)

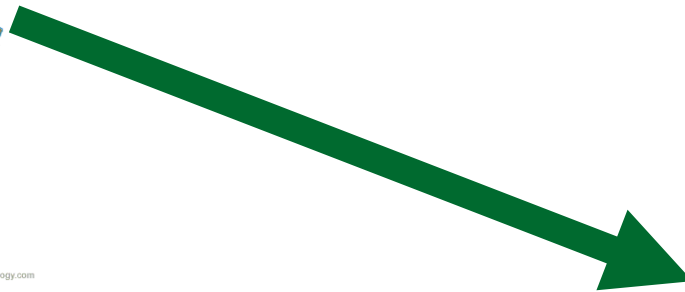
# Transparency

- Expectation: Third party oversight for BMP enforcement and traceability
- Start with high bar –
  - BMP Enforcement - ISO 17065 certification (same as life safety)
  - Traceability - Chain of custody % claim (same as certified)
- Document certification audits and making the findings publicly available
- Audit frequency – currently annual



# ASTM D7612 Demonstration Program

**BMPs**



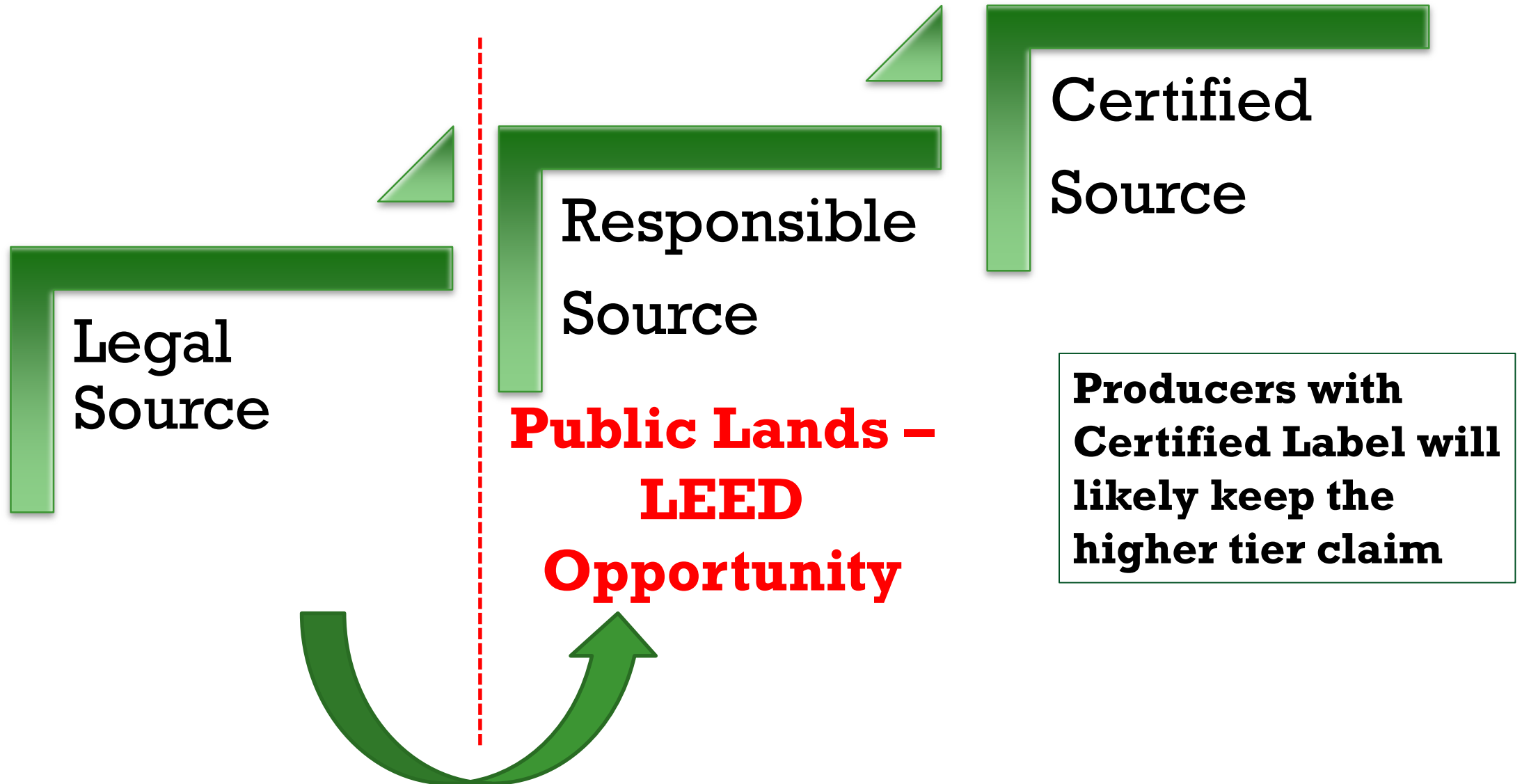
**BioPreferred**®



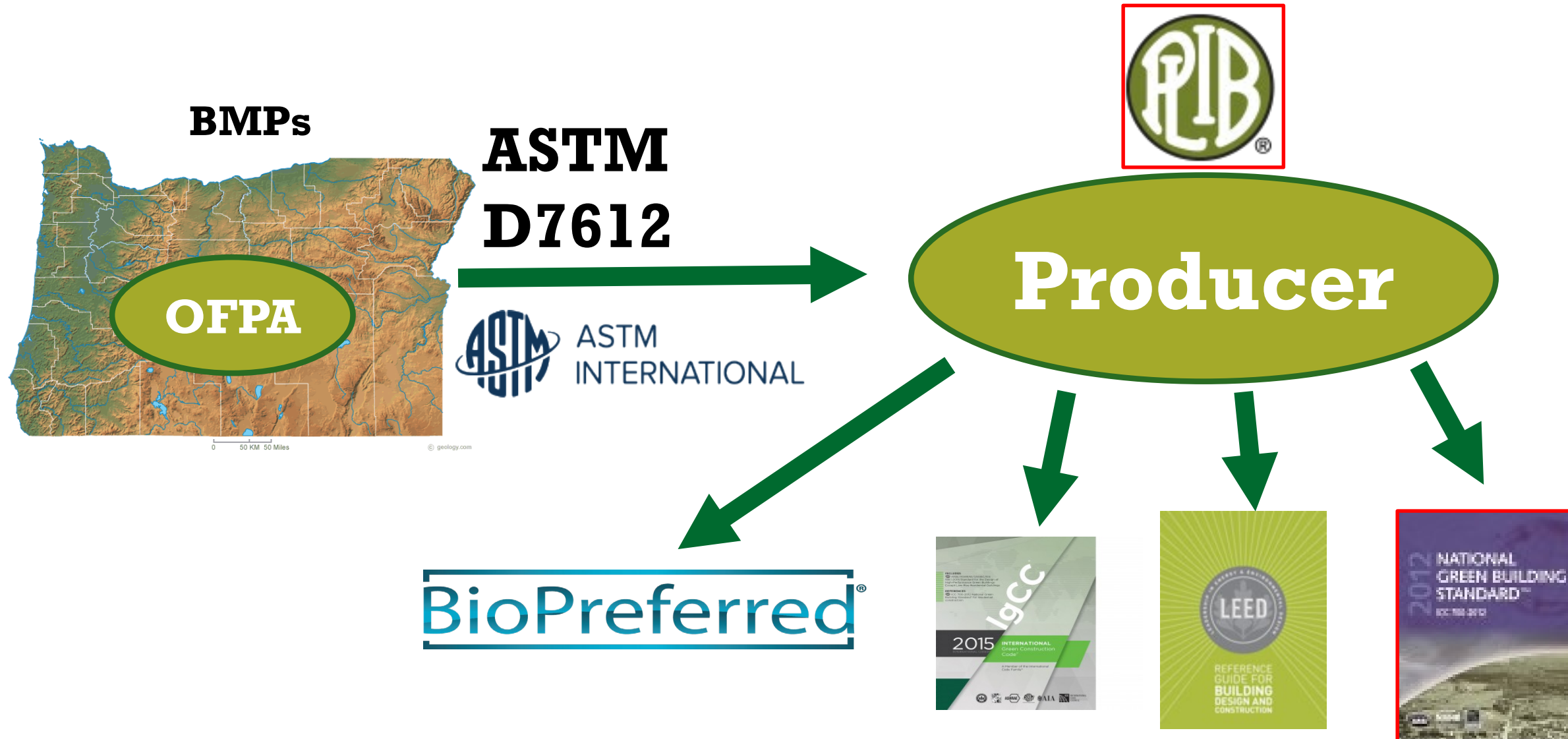
## LEED v4 Alternative Compliance Path

- 100% of all wood verified to be sourced from *Legal Sources* as defined by ASTM D7612, and
- 70% of all wood must be sourced from *Responsible Sources* as defined by ASTM D7612.

# Adding Value – Legal to Responsible



# ASTM D7612 Demonstration Program






# Steps to Achieving a “Responsible Source” Designation

- Manufacturer is required to have:
  - Management system - QC manual – designated employees to program
  - Accounting method – separation, percentage, mass balance
  - Sales requirements – on-product label or claim on invoice
  - Method of determining legality of wood – FERNS on purchase orders in Oregon
  - Audit by PLIB, annual reinspection



PACIFIC LUMBER INSPECTION BUREAU   
 www.plib.org

Head Office: 909 S. 336<sup>th</sup> Street, Suite 203, Federal Way, WA 98003 (253) 835-3344  
 Canadian Division: P.O. Box 19118, 4<sup>th</sup> Avenue Postal Outlet, Vancouver, B.C. V6K 4R8 (604) 732-1782

**CHAIN OF CUSTODY CERTIFICATION**  
**ASTM D7612 RESPONSIBLE SOURCES**  
**PLIB-RS-0001**

Company:	Roseburg Forest Products Co. 3660 Gateway St, Springfield, OR 97477	Standard:	ODF Traceability Requirements for Responsible Sources
Certified Location:	Dillard Sawmill, Dillard, OR	Method:	Percentage
Product(s) Certified:	Lumber	COC Number:	PLIB-RS-0001
Effective Date:	September 1, 2018	Expiry Date:	August 31, 2023

The Roseburg Forest Products Co., Dillard, OR lumber manufacturing facility is found to satisfy the Oregon Department of Forestry 'Traceability Requirements for Responsible Sources' consistent with ASTM Standard D7612 Standard Practice for Categorizing Wood and Wood-Based Products According to Their Fiber Sources.

Roseburg Forest Products Co. is authorized to use the claim "PLIB-RS-0001 Responsibly Sourced - ASTM D7612" on product labelling and/or invoices.

# ASTM D7612 – Japan Legal Wood



**ASTM  
D7612**



**More investigation needed**

# Certifying Alaska BMPs – Potential Benefits

- Timber classified as Responsible (and Legal) in LEED standards
- Potential recognition in Japan as legal timber

QUESTIONS?