Guidance regarding documentation required to verify district of origin for Controlled Wood

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The following is Policy from PSU (Policy and Standards Unit) Issued Dec. 8, 2010.

ADVICE-40-005-04	**What kind of documentation and control is required to verify the geographical district of origin?**
Normative reference	FSC-STD-40-005 V2-1 Clause 8.1
Effective date	08 April 2009 revised 01 July 2010 revised 08 December 2010
Terms & definitions	*Company*: the legal entity that must comply with FSC STD-40-005 V2-1 which is either the certificate holder or an applicant for certification.
Background	Companies are required to maintain documentation that demonstrates the district of origin.
Advice	1. In order to demonstrate compliance with Clause 8.1, companies shall keep records to demonstrate the district of origin at the forest level. These records should include, but not be restricted to, legally required transport documents and proof of purchase from the forest management unit of origin. Documents to demonstrate origin shall be available to the certification body during audits and upon request. A declaration from the supplier may only be used as a part of the body of documentation for demonstrating district of origin. A supplier declaration alone, even if covered by a contractual agreement, is not considered sufficient proof of the origin of the timber. 2. In addition to 1.1 (above), for suppliers located in countries with a CPI below 5, companies shall conduct a plausibility test of the information collected as per Clause 8.1. This test should include plausibility criteria defined by the company, such as distance and means of transport, timber species, supplier relationship, etc. NOTE 1: It is the responsibility of the company to evaluate the plausibility criteria and come to a fair and objective judgment regarding the plausibility and reliability of the information provided. The precautionary principle should be applied. NOTE 2: If the result from the plausibility test is negative, the material should not be used as controlled material input. 3. Certification Bodies shall confirm that adequate documentation is maintained and verified at each surveillance audit.

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Implementation notes	1. The term 'district of origin at the forest level' is included to permit that documentation from an administrational level other than the FMU level may be acceptable to demonstrate the district of origin. Such entities would need to be invoicing for wood from within a homogenous risk district. It is essential, that such invoicing systems can be demonstrably linked to the specific homogenous risk district. 2. Legally required transport documents and proof of purchase from the responsible Forest Management Enterprise from whom the timber originates are considered to be sufficient to demonstrate district of origin at the forest level. However, where such documentation is not currently the norm, other forms of evidence, which hold at least the same degree of integrity, may prove sufficient. Such evidence could include unique identifiers, such as non removable tags, which are directly linked to the FME of origin. 3. A declaration from the supplier alone is not considered sufficient evidence under the current regulations. If such a declaration is provided, it needs to be backed up by documentation which formally demonstrates the district of origin to the forest level (see implementation note 2). 4. Where such documentation is not available, the supply cannot be accepted as Controlled Wood. In such cases a Controlled Wood Chain of Custody will be required to link the supply to the district of origin at forest level, either to FSC-STD-40-005 or FSC-STD-30-010.

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Notes:

Guidance may be available soon regarding the relationship between this regulatory document and the framework developed by FSC-US and FSC Canada. Additionally, FSC-US and FSC Canada are exploring options for more explicit acceptance or denial of the use of specific mechanisms and documents for conformance with this ADV note.

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