

Maine WoodNet Certified Group

SW-COC-737



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Christine Krauss & Spencer Phillips

WWW.MAINEWOODNET.ORG



THE WILDERNESS SOCIETY

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Cover design by Christine Krauss

For information about Maine WoodNet or to obtain additional copies of the Maine WoodNet Certified Group Manual, please contact Christine Krauss at P.O. Box 265 East Wilton, ME or info@mainewoodnet.org; or Spencer Phillips at P.O. Box 25, Craftsbury Common, VT 05827 or srp@sover.net.



THE WILDERNESS SOCIETY

Founded in 1935, The Wilderness Society works to preserve America's wilderness and to develop a network of wild lands through public education, scientific analysis and advocacy. Our goal is to ensure that future generations will enjoy the clean air and water, wildlife, natural beauty, opportunities for recreation and spiritual renewal that protected forests, rivers, deserts and mountains provide.

**MAINE WOODNET CERTIFIED GROUP
CHAIN OF CUSTODY MANUAL**

**APPROVED: MAY 15, 2002
STEERING COMMITTEE**

SUMMARY

To market products with an FSC label, manufacturers must undergo chain-of-custody certification. Chain-of-custody certification tracks logs from forest to manufacturer to consumer to ensure truth in advertising and provide a mechanism to trace finished wood products back to the forest of their origin. Central to chain-of-custody certification is the ability to control and document the movement and transformation of certified products throughout the manufacturing process. Through Group Chain of Custody Certification, Maine WoodNet will enhance its ability to demonstrate and promote the connection between a healthy, local forest products industry and a healthy forest ecosystem.

Maine WoodNet (MWN) is a project of The Wilderness Society. MWN is dedicated to assisting small to medium size value-added wood product firms in Franklin, Oxford and Somerset Counties. MWN members produce a variety of high quality wood products from one-of-a-kind gallery pieces to production items available to the national and international market place. This group certification is taking place as an efficient and cost effective means to certify small and medium size wood products businesses.

The Wilderness Society, founded in 1935, works to protect America's wilderness and to develop a nationwide network of wild lands through public education, scientific analysis, and advocacy. Its goal is to ensure that future generations enjoy the clean air and water, beauty, wildlife, and opportunities for recreation and spiritual renewal provided by the nation's pristine forests, rivers, deserts, and mountains.

Because a network of wildlands includes managed timberland, part of The Wilderness Society's strategy is to demonstrate and promote the concepts of "wood use efficiency" – that is, making the most of harvested timber – and of using the market to reward excellence in forest stewardship. Through efficiency improvements, coupled with certification and labeling of products from well-managed forests, we hope to foster a healthy, forest-based manufacturing industry while enhancing the capital stock – the forests – on which it depends.

As the responsible party named in the chain-of-custody certificate, Maine WoodNet Certified Group maintains ultimate responsibility for maintaining the certification contract and will be held responsible for upholding the chain of custody system at its participant facilities. Any violation that occurs at the member level will be the legal responsibility of the MWNCG. MWNCG shall be fully responsible for paying all the costs of evaluation and monitoring throughout the period of validity of the certificate.

DEFINITION OF TERMS

Certified Group Coordinator	Lead contact person for the CoC Certificate for MWNCG. The Maine WoodNet Project Coordinator is the Certified Group Coordinator.
Certified Project	A production run using wood certified under the FSC system and bearing the MWN and FSC logo. Such production runs can comprise of either single or multiple units.
Certifier	An independent organization accredited by FSC as competent to evaluate the conformance of forest management and chain-of-custody operations to FSC principles. MWNCG anticipates that SmartWood will be its certifier.
CoC	Chain-of-custody refers to the complete process by which wood is transformed from a tree in the forest to a final end product provided to a consumer in a wholesale or retail market; e.g. from the forest, to sawmill, to processing facility (or facilities), to the marketplace.
Control System	A written description of how raw FSC material is segregated; tracked in the production stage; and on how the finished product is tagged to indicate that it is FSC Certified and at what level (percentage).
Corrective Actions	Address any weakness in implementing CoC procedures.
FSC	Forest Stewardship Council, an international not-for-profit organization that sets standards for certified forestry, accredits certification organizations (see certifier) and governs the use of the FSC logo.
MWN Members	The individuals and firms that comprise Maine WoodNet
MWN	Maine WoodNet, a project of TWS
MWNCG	Maine WoodNet Certified Group. Participants who are legally authorized to manufacture and market FSC Certified products.
Off product use	Use of the Trademark on brochures, point of sale materials, leaflets, advertising, promotions, company prospectus, posters, reports, etc. MWNCG participants shall obtain approval of any use of logo off product with MWNCG Coordinator before use.
On product use	Labeling of products or on the packaging of products that came from FSC certified forests. Such uses include product tags, labels, stencils, heat brands, retail packaging for small loose products (such as pencils,) protective packaging, plastic wrap, etc.
Participants	The subset of MWN members who join in the MWNCG to sell, build or handle certified wood products

Percentage Based Products	Wood products that are a mix of certified and non-certified wood. For these products to be certified they must meet current FSC guidelines.
Project Director	Currently held by Spencer Phillips, Resource Economist for The Wilderness Society. Overall management of MWN projects including CoC Certification.
Statement of Principles	Written statement of FSC, certification, and MWNCG principles covering sound forest management practices and CoC procedures to which all MWNCG participants must subscribe.
Steering Committee	Decision-making body appointed by the Project Coordinator to determine procedures and make decisions for MWNCG
TWS	The Wilderness Society

1. ROLES AND RESPONSIBILITIES

a. Steering Committee

- i. Composition. The Steering Committee shall consist of the following:
 - 1) No fewer than three and no more than five Maine WoodNet members
 - 2) MWN Project Coordinator
 - 3) MWN Project Director
- ii. Selection. Steering Committee appointed by the project coordinator.
- iii. Term. Steering Committee members shall serve one-year terms and may be re-appointed to successive terms.
- iv. Responsibilities:
 - 1) Attend regular meetings (quarterly unless otherwise suggested by the Steering Committee or Project Coordinator)
 - 2) Draft and approve a statement of principles.
 - 3) Accompany the Project Coordinator whenever possible on site visits.
 - 4) Assist the Project Coordinator in promoting the attributes of sustainable forestry by helping educate the public on FSC Certified products
 - 5) Set and approve chain-of-custody guidelines for MWNCG. These guidelines shall cover: tracking and segregating FSC materials; logo use; annual inspection of Group Participants; and admitting new participants to the Certified Group.
- v. Decision Making:
 - 1) Decisions regarding Statement of Principles, Adoption of MWNCG Manual (this document), and approval of the design of the Logo shall be made by consensus.
 - 2) Decisions regarding the addition or removal of MWNCG participants shall be by majority vote of the Steering Committee members and the Project Coordinator. The Project Director will vote only to break a tie.

- b. Certified Group Coordinator
 - i. Serves as lead contact person for the MWNCG and the FSC Certifier.
 - ii. Facilitates and records minutes for quarterly Steering Committee Meetings.
 - iii. Maintains records of all certified projects by MWNCG participants for which the COC certificate is used – that is, when the product is to be sold as “FSC-certified”.
 - iv. Works with MWNCG participants to ensure the integrity of the chain-of-custody of certified material within individual shops and between multiple shops. This includes training new group participants in using the MWNCG record keeping system, logo use rules and other aspects of certification.
 - v. Conducts annual on-site visits and records review of active MWNCG participants. Creates and updates, as necessary, reports and forms.
 - vi. Brings any irregularities to the attention of the Steering Committee. Any violations of the Statement of Principles or of this manual must be documented in writing and corrective actions defined.
 - vii. Maintains communications with the certifier and MWNCG participants to keep MWNCG documents, procedures, etc. up-to-date with FSC and Certifier requirements.
 - viii. Ensures proper use of the MWN / FSC combination logo (see Attachment B).
 - ix. Will assign and monitor use of participants CoC sub code.
 - x. Promotes awareness of FSC Certified products by the education and cultivation of non-participating members.
- c. MWNCG Participants
 - i. Agree to and sign MWNCG Statement of Principles (see Attachment A)
 - ii. Participants shall actively seek to produce FSC-certified products.
 - iii. Participants, with assistance from the Coordinator, shall prepare a written description of the participant’s strategy or strategies for segregating FSC-certified raw material, intermediate products or components, and finished products.
 - iv. Participants must follow all MWNCG Manual requirements (i.e. this document), including, but not limited to:
 - 1) Completion of training regarding C-O-C record keeping, logo use and other functions;
 - 2) proper and prompt completion of Certified Project Data Sheets for all certified projects;
 - 3) Maintenance of all documentation regarding certified projects; includes purchase and sale and shipping documents;
 - 4) proper use of the MWN / FSC logo and obtain approval for all uses (on or off product) of MWN / FSC logo; and
 - 5) provide assistance with annual on-site audits by the MWNCG coordinator and, when applicable, the certifier.

2. Procedures for Adding MWN members to the MWN Certified Group

- a. Any MWN member with an interest in manufacturing and marketing FSC-labeled, certified wood products may request to join the MWNCG. These participants must meet the requirements outlined in this section.
- b. The Project Coordinator will meet with the member on site, review Statement of Principles, MWNCG CoC Manual, including logo use guidelines, and other MWNCG documentation; discuss w/ member his or her capacity for managing streams of certified and non-certified raw material, goods in process and finished products. This discussion will include a review of options or strategies for identifying, segregating certified material.
- c. Based on this visit and discussion, the Project Coordinator will prepare a written report and circulate it to the Steering Committee for review. The report will include the prospective participant's draft control system strategy for handling certified products and a signed copy of the Statement of Principles (see attachment A).
- d. The Steering Committee will then meet in person or via conference call to discuss and vote on the member's petition to join MWNCG.
- e. The Certified Group Coordinator will then notify the Certifier of the potential addition to MWNCG. Participants must meet current eligibility criteria.

3. Procedures for ensuring integrity of the chain of custody for certified projects

- a. The participant, with assistance from the Coordinator shall define a control system appropriate to the participant and his or her facilities, operations and likely certified projects. In general, the "Control System" is the set of procedures that the participant will follow so that the participant's employees, the MWNCG Coordinator, and the certifier can readily and accurately distinguish those raw materials, intermediate products and finished products from FSC-Certified forests from those that are not. Such procedures may include using tags, stamps, paint, sorting bins, separate runs or batches, separate facilities, etc.
- b. MWNCG participant will notify the MWNCG Coordinator at the initiation of the first certified project. At the discretion of the Coordinator, a site visit may be arranged to provide any assistance that may be necessary in implementing the control system for that project.
- c. MWNCG participant must notify MWNCG Coordinator of any change to document control system.
- d. MWNCG Coordinator will provide data sheets for the project and review procedures for their completion and return to the Coordinator (see attachment D).
- e. The Participant shall maintain complete written records for all certified projects. Copies of relevant chain-of-custody documentation for all certified projects shall be sent to the Project Coordinator along with completed project data sheets. **Participants are encouraged to "white-out" or otherwise exclude from these copies information of a proprietary and/or financial nature, such as prices for materials or products.**
- f. MWNCG Coordinator will review completed data sheets and enter data into the MWNCG electronic database. A description of the information to be recorded in the database is included in Attachment E.
- g. MWNCG Coordinator will review MWN / FSC logo and sub code procedures with the participant and may provide assistance with marketing the certified product.

4. Logo Use and Product Labeling Procedures

- a. The logo is the consumer's link to better forest management – the integrity of the logo is paramount in the FSC system and in MWNCG as a part of that system. MWNCG participants must assume individual responsibility for the collective value of the certification (i.e. any one member could damage the reputation of the entire group).
- b. MWNCG participants shall obtain approval from the Coordinator for any use of the MWN / FSC logo or make any marketing claims regarding FSC. The Coordinator shall, in consultation with the certifier, ensure that such use conforms to FSC and certifier requirements.
- c. MWNCG shall develop, in conjunction with the certifier, standard claims that participants could make in relation to the group certification.
- d. As the certificate is issued in the name of MWNCG, any representation of certified status of group participants and their products must be made in reference to the group. Each participant must utilize their assigned CoC sub code in all sales documentation
- e. The MWN / FSC logo can be found in attachment B.
- f. The MWN / FSC logo may be used ON PRODUCT (that is, on product tags, labels, stencils, heat brands, retail packaging for small loose products, protective packaging, plastic wrap, etc.) when the product is composed entirely of FSC-certified wood, or meets the current FSC percentage based claims policy.

The MWN / FSC logo may generally be also be used on assembled products when at least 70% by volume of the wood used in manufacturing the product. Any claims or labels referencing FSC on such products shall adhere to the requirements of the "FSC Policy On Percentage Based Claims." In such cases, the label, hang-tag, etc. must state the percentage of FSC-certified wood. See FSC Policy on Percentage-Based Claims for full details. Compliance for percentage-based products must be demonstrated to MWNCG Coordinator.

- g. In general, MWNCG does not permit the use of its logo OFF PRODUCT (that is, in advertising, web pages, promotional materials, etc.)¹. Instead, MWNCG's collective marketing efforts will promote the capability of MWNCG participants to provide FSC-certified products.
- h. How can the Logo be used on product
 - i. Case-specific, being sensitive to the physical and aesthetic aspects of the product
 - ii. May be accomplished though one or more of the following methods
 - 1) Burning or branding
 - 2) Stamping
 - 3) Screening
 - 4) Hang Tag

¹ The reason for this restriction is so that we can avoid misunderstanding on the part of consumers about whether ALL of the participant's products are certified and/or whether the participant has been individually certified. The certification is of MWNCG, not of any individual participant. Therefore, MWNCG should be responsible for promotion of the group's collective ability to provide FSC-certified products.

- 5) Labeling
- iii. The Group CoC number and participants sub code are part of the MWN / FSC Logo and must accompany the Logo's use on and off product. (See Attachment B)

5. Record Keeping by MWNCG Coordinator

- a. Certified Project database will provide complete information about all MWNCG Certified Projects and enable tracking of the wood in any product sold under the MWN / FSC Logo back to the certified supplier and whenever possible its forest of origin. The database shall be backed up to removable media monthly and shipped off-site to the Project Director.
- b. For each MWNCG participant, the Coordinator shall maintain:
 - i. A copy of the participant's written description of his or her control system
 - ii. A copy of the report prepared in advance of participant's joining the MWNCG
 - iii. A copy of any records related to internal inspections, non-compliance identified in such inspections and actions taken to correct any such non-compliance.
 - iv. The date of leaving of any participants, and an explanation of the reason why the participant left the MWNCG.
- c. All documentation, including electronic records shall be archived for at least 5 years.

6. Procedures in the event of non-compliance

- a. The integrity of MWNCG is dependent on the participant's strict adherence to the manual guidelines. In the case of any irregularity that has come to the attention of the project coordinator, whether by outside complaint, including any complaint relayed by Certifier, irregularities evident in site visits during or after completion of certified project, and or irregularities evident in the project coordinator's review of documentation, the following measures will be taken:
 - i. the Project Coordinator will contact MWNCG participant
 - ii. a review of all documentation, and other available information related to the disputed certified project will be held by the Project Coordinator
 - iii. a written report, including suggested corrective action will be presented to the participant and to the Steering Committee
 - iv. steering Committee decides on corrective action
- b. Corrective actions will be case-specific and may include further training in procedures. Failure to follow corrective actions and or chronic non-compliance with procedures may result in temporary or permanent removal of the participant from MWNCG by the Steering Committee.

ATTACHMENTS:

Attachment A	Statement of Principles
Attachment B	Logo Samples
Attachment C	Steering and Advisory Committees
Attachment D	Project Data Sheet
Attachment E	MWNCG Participants