

## Public Notification Letter

### FSC® Chain of Custody Controlled Wood Stakeholder Consultation

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To: Interested Parties

From: SCS Global Services

Consultation period: **3 August 2018 – 14 September 2018**

Re: Notification of intent to audit **Columbia Vista Corporation** against FSC Chain of Custody Controlled Wood standard FSC-STD-40-005 V3-1

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The Forest Stewardship Council® (FSC) requires that a certification body conducting an audit of a certified organization or applicant must consult stakeholders whenever the audit includes intent to source and use uncertified material in an FSC Chain of Custody (CoC) program according to the requirements in FSC-STD-40-005 V3-1 “Requirements for Sourcing FSC Controlled Wood”. Therefore, SCS Global Services (SCS) is seeking input from interested and directly affected stakeholders regarding the relevance, effectiveness, and/or adequacy of **Columbia Vista Corporation’s** Due Diligence System (DDS).

An explanation of ‘FSC Controlled Wood’, as well as a copy of FSC-STD-40-005 V3-1, is available here: <https://ic.fsc.org/en/certification/types-of-certification/controlled-wood-02> ; a copy of this standard is also available from SCS upon request.

Due Diligence Systems are required for certified organizations in order to avoid the sourcing and use of material originating from unacceptable sources in their FSC CoC program.

Directly affected stakeholders include any person, group of persons, or entity that is, with high probability, subject to the effects of the activities related to an organization’s controlled wood sourcing program, including the activities of their suppliers and sub-suppliers, as well as those who influence risk identified through the organization’s Due Diligence System.

***This letter serves as SCS’ invitation to directly affected stakeholders to participate in our consultation process. This letter also serves as SCS’ public notification for any interested stakeholders, who are also invited to participate in the consultation process. Participation in this stakeholder consultation process is voluntary; stakeholders are not required to submit comments.***

#### **Scope of audit and audit details:**

The audit will assess the conformity of the organization’s controlled wood program – including Risk Assessment(s) and DDS – according to the certification requirements as per FSC-STD-40-005 V3-1.

The company’s DDS Public Summary and Risk Assessment (excluding confidential information), as well as any other information or documents deemed relevant for the purpose of this stakeholder consultation, are included as appendices to this letter—see below. For a list of the information that is required to be publically available for stakeholder consultation by SCS, see FSC-STD-40-005 V3-1, Section 6.

**Additional certificate holder information:**

<https://info.fsc.org/details.php?id=a0240000005sSfhAAE&type=certificate>

**Options for participation and provision of comments:**

Please submit written comments and evidence (where appropriate) by mail, FAX or email to SCS:

SCS Global Services  
Att'n: Chain of Custody Certification Services  
2000 Powell Street, Suite 600  
Emeryville, CA 94608

Fax: 510-452-6882

Email: [CWStakeholder@SCSGlobalServices.com](mailto:CWStakeholder@SCSGlobalServices.com)

A summary of the stakeholder consultation and comments received will be made publically available on the FSC certificate database, as per FSC-STD-20-011 V4-0. Verbatim comments will only be published with prior consent from the stakeholder and will not be associated with stakeholder names.

Note that, while SCS is required to evaluate all information and comments objectively, SCS certification decisions are affected by stakeholder comments only insofar as the comments provide evidence of conformity or nonconformity to the applicable requirements.

Within 30 days of making our certification decision, SCS will respond to all stakeholders who provided comments to explain how their comments were taken into account.

More information about FSC and SCS can be found on our respective websites: [www.fsc.org](http://www.fsc.org) and [www.scsglobalservices.com](http://www.scsglobalservices.com).

## Publically Available Information for FSC Controlled Wood Certificate Holders

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### INSTRUCTIONS

FSC® requires that organizations track their controlled material and publish specific findings. This form helps you meet the requirements in Section 6 of FSC-STD-40-005 V3-0 “Publically Available Information”.<sup>1</sup>

<b>Organization Name</b>	Columbia Vista Corporation
<b>FSC COC Certificate Number</b>	SCS-COC-003839

<b>Name of Authorized Representative</b> (Contact information for person or position responsible for addressing complaints)	Devin Sanders Columbia Vista Corporation HR, Safety & Environmental Manager 360-892-0770 Ext. 114 <a href="mailto:dsanders@columbiavista.com">dsanders@columbiavista.com</a>
<b>Procedure for filing complaints</b> <i>Note: for further details on complaints procedure, see section 7 in FSC-STD-40-005 V3-0</i>	<p><b>F. Complaints Mechanism</b></p> <p>Columbia Vista shall maintain a record of any complaints, supported by evidence which are registered regarding claims for controlled wood and FSC Chain of Custody regardless of whether the supply comes from areas considered low risk or not. For each claim registered the company shall:</p> <ol style="list-style-type: none"> <li>1. acknowledge the complaint to the complainant.</li> <li>2. Assess the evidence provided and respond to claimant within two weeks of receipt of the claim.</li> <li>3. Perform field verification of the claim if evidence is considered relevant, within two months of the receipt of the claim.</li> <li>4. Exclude the supply and the supplier from the company controlled wood category if non-conformance is found. In such case</li> </ol>

<sup>1</sup> This document is meant as guidance only, utilization of templates and guidance documents is no guarantee of conformity with FSC requirements. It is your organization’s responsibility to conform to relevant FSC requirements.

	<p>the material shall be considered uncontrolled wood and shall not be purchased.</p> <ol style="list-style-type: none"><li>5. Any supplier that is excluded from supply of controlled wood to Columbia Vista may again be included as an approved supplier if it meets all the requirements for controlled wood as set forth in this document.</li><li>6. Columbia Vista shall notify SCS and the relevant FSC National Initiative or FSC Regional office of all occurrences of non-compliance with FSC controlled wood and CoC requirements in areas considered to be low risk. If there are several occurrences of non-compliance in the same low risk region the company shall re-evaluate the classification of low risk for that area.</li><li>7. Ensure that any appropriate corrective and preventive actions are taken.</li></ol> <p>All information regarding claims shall be maintained electronically. All records shall be maintained for a minimum of five years and shall be available for inspection by NSF upon request.</p>
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<b>Risk Assessment Summary</b> In the case that there are multiple risk assessments, copy and paste this table below for each assessment.	
<b>Description of Supply Area</b>	CVC defines the supply area of origin for its wood purchases as follows:  <b>United States</b> <b>Oregon: ecoregions</b> listed in the CVC Risk Assessment under C.3 <b>Washington: ecoregions</b> listed in the CVC Risk Assessment under C.3
<b>Reference to the applicable Risk Assessment</b>	Please Reference the attached Forest Stewardship Council Controlled Wood Risk Assessment For Columbia Vista Corporation Certificate Code: SCS-COC-003839, Trademark License Code: FSC-C009244 CVC sources its wood from Oregon and Washington, United States of America
<b>Submit applicable risk assessment (excluding confidential information) in a separate document</b>	
<b>Risk Designations Summary</b> For any category not rated as "Low" please fill in control measures by risk assessment indicator	<b>Sub-category</b>
In order to select a checkbox, "double-click" on the box, and select default value as "checked".	
<b>Overall Risk Designation for the Supply Area</b>	<input type="checkbox"/> Unspecified (see below for unspecified risk designations) <input checked="" type="checkbox"/> Low
<b>1. Illegally harvested wood</b> Overall Risk Designation: <input type="checkbox"/> Unspecified <input type="checkbox"/> Low Control Measures per indicator (if applicable)	1.1 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 1.2 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 1.3 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 1.4 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low
<b>2. Wood harvested in violation of traditional and human rights</b> Overall Risk Designation: <input type="checkbox"/> Unspecified <input type="checkbox"/> Low Control Measures per indicator (if applicable)	2.1 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.2 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.3 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.4 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 2.5 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low
<b>3. Wood harvested from forests in which high conservation values are threatened by management activities</b> Overall Risk Designation: <input type="checkbox"/> Unspecified <input type="checkbox"/> Low Control Measures per indicator (if applicable)	3.1 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low 3.2 <input type="checkbox"/> Unspecified <input checked="" type="checkbox"/> Low

<p><b>4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses</b> Control Measures (if applicable)</p>	<p>4.1    <input type="checkbox"/> Unspecified    <input checked="" type="checkbox"/> Low</p>
<p><b>5. Wood harvested from forests in which genetically modified trees are planted</b> Control Measures (if applicable)</p>	<p>5        <input type="checkbox"/> Unspecified    <input checked="" type="checkbox"/> Low</p>

## Stakeholder Consultation Summary

N/A No stakeholder consultations conducted

**Summary of the consultation  
process(es) performed according to  
Annex B of FSC-STD-40-005 V3**

## Expert Engagement Summary

N/A No expert engagement conducted

**Information on the engagement of one or more experts in the development of control measures in accordance with Annex C of FSC-STD-40-005 V3**

*Note: For individual experts this includes the names of the experts, their qualifications, their license/registration number (if applicable), and the scope of their services. For publically available expertise, the specific sources of information shall be cited.*



## Summary of Field Verification (undertaken as a control measure)

N/A No field verifications conducted as control measures

**A summary of the organization's findings from field verification undertaken as a control measure, and steps taken by the organization to address identified non conformities where they occurred, unless confidential. The organization shall provide a justification for the exclusion of confidential information.**

*Note: The confidential nature of the information may be determined by the legislation that the organization must be in compliance with. Commercially sensitive information, and the names of individual landholders may be treated as confidential.*



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# **Forest Stewardship Council Controlled Wood Risk Assessment For Columbia Vista Corporation**

Certificate Code: SCS-COC-003839,

Trademark License Code: FSC-C009244

CVC sources its wood from Oregon and Washington, United States of America

**Devin Sanders**



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## Summary of Findings

To show compliance with standards for Controlled Wood Columbia Vista Corporation (CVC) must determine the supply area of origin for its wood supplies and develop a risk assessment as outlined in the Controlled Wood Standard FSC-STD-40-005 V3-1 EN. CVC sources its wood from Oregon and Washington.

An assessment of CVCs' current wood sources from the supply areas of origin establishes that they come from areas that can be designated as low risk. This means that CVC should be able to consider, and designate, all purchased wood that is non-FSC-certified as FSC Controlled Wood.

### Background

The FSC "Standard for Company Evaluation of FSC Controlled Wood" (FSC-STD-40-005 V3-1 EN) is designed to ensure companies avoid trading in:

- A. illegally harvested wood;
- B. wood harvested in violation of traditional and civil rights;
- C. wood harvested in forests where high conservation values are threatened by management activities;
- D. wood harvested in forests being converted to plantations or non-forest use; or,
- E. wood from forests in which genetically modified trees are planted.

Compliance with the standard allows companies to supply FSC Controlled Wood to FSC certified chain of custody companies for the purpose of mixing with FSC certified material. The standard is designed to allow companies to demonstrate that they are implementing best efforts to avoid the trade in wood products from egregious sources.

### Supply areas of origin

CVC defines the supply area of origin for its wood purchases as follows:

#### United States

**Oregon: ecoregions** listed below under C.3

**Washington: ecoregions** listed below under C.3



## Risk Assessment

### A) Illegally Harvested Wood

#### Summary of Findings

One can conclude that the supply areas of origin as described as the CVC Woodshed are LOW RISK in relation to the risk of illegal harvesting through compliance with Criteria 1.1-1.3. This determination is based on the following:

1. There is scant evidence that illegal logging occurs in the CVC Woodshed;
2. The U.S. is found to be a country recognized for good governance.
3. The U.S. is rated at 7.1 by Transparency International in their corruption perceptions index. This is based on 0 being highly corrupt and 10 being very clean.

#### Assessment

Determination of risk is based on evidence of sound governance in relationship to forest management. A company can make a determination of risk of non-certified wood based on if the wood comes from an area where there is low risk for systematic illegal logging or if the wood is accompanied by credible documentation of its legality.

In a literature search, the term illegal logging is not as commonly used in the US as the terms *timber theft*, *tree poaching*, and *unlawful logging* are. These activities take place mostly in two regions, the Pacific Northwest and the Southeast.

In one way, the question of possible timber theft in the supply areas of concern, in the U.S., cannot be completely resolved. This is because it occurs on an extremely small scale. Although it undoubtedly does on occasion occur, the scale of the activity is not large enough to be of import in assessing the wood procurement of a major forest enterprise or be considered to contribute to a violation of civil or traditional rights. According to government sources in the U.S. the illegal harvest of forests rarely goes beyond a scale individuals illegally procuring firewood.

There are specific laws concerning timber trespass on both private and public lands in the supply areas of concern. However, the occurrence of timber theft is so insignificant that data are generally not kept by most of the government agencies.

A recent search of court cases shows that there are only two federal cases



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and nine state cases of timber theft decided within the past five years. Four of the state cases were in Louisiana, two in Mississippi, two in Washington and one in Wisconsin. According to the literature, timber theft cases are rarely reported at the state level since prosecutions are uncommon.

CVC can demonstrate compliance with this risk category in three ways:

1. The United States is not identified as a country with issues related to illegal harvesting in any of the sources of information referenced in FSC-STD-40-005v2-1 section B.1.
2. A definitive study on the topic of illegal logging, "Illegal Logging and Global Wood Markets: the Competitive Impacts on U.S. Wood Products Industry" does not identify the U.S. as a source of illegal wood [1].
3. The extensive evidence that the U.S. is recognized for good governance.

### **B) Wood harvested in violation of traditional and civil rights Summary of Findings**

One can conclude that the CVCs' supply areas of origin as described are LOW RISK in relation to threat of violation of traditional and civil rights through compliance with Criteria 2.1-2.5. The determination is based on the following:

1. Within the CVC woodshed there is no UN Security Council ban on timber exports, the areas are not designated as a source of conflict timber, child labor does not occur systematically, and ILO Fundamental Principles and rights at work are respected. In addition, the U.S. has recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity.
2. Any National Forests in the U.S. have a clear and detailed process for conducting timber sales that includes consultation with all potentially affected communities, tribal nations and other civil society groups. While there may be conflict over these sales, the appeals process is transparent and available to all parties.

### **Assessment**

Determination of risk should be based on evidence that the wood does not originate from areas where there is a UN Security Council ban, where conflict timber is an issue, where there is evidence of prolific child or slave labor,



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where there is no equitable process of conflict resolution for issues surrounding traditional and cultural rights, and where there is no evidence of systematic violation of indigenous customary rights (as in ILO Convention 169).

As in legality, the determination of risk is subjective and contingent upon a global perspective of the issues in order to make a judgment based on the relative risk of these issues and their impacts on local culture and society. A key component of determining risk in the Criterion is assessing if a country or region has structures and processes for resolving traditional and cultural rights that are accepted by indigenous peoples, workers, communities and government.

Within the CVC woodsheds there is no UN Security Council ban on timber exports, the areas are not designated as a source of conflict timber, child labor does not occur systematically, and ILO Fundamental Principles and rights at work are respected. In addition, the U.S. is recognized as having equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity.

### **C) High Conservation Value Forest**

One can come to the conclusion that the supply areas of origin as described as the CVC woodshed are LOW RISK in relation to threat to High Conservation Values through compliance with Criterion 3.1 and/or Criterion 3.2 (see item 3). Our determination is based on the following:

1. Ecoregions included in the woodshed of CVC are not noted for concentrations of biodiversity values. Logging has been identified as a threat in some of these ecoregions, but the single ecoregion that was identified to be at an "endangered" level by the protected areas assessment (Willamette Valley) faces threats associated with activities other than forestry. This ecoregion contains huge population centers and primary threats to the integrity of the ecosystems revolved around urban/suburban development, recreational development, and pollution. In this ecoregion, maintaining working forests is key to the integrity of the ecoregions.

2. None of the areas which make up the CVC woodshed are included in assessments of large landscape-level forests by WRI/Global Forest Watch Frontier Forests.



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3. There is no overlap between Greenpeace identified Intact Forest Landscapes and the Warm Springs woodshed.

### **C.3 Assessment of Criteria 3.1**

#### ***Ecoregional Identification***

There are seven ecoregions from which CVC will potentially purchase wood. These are:

Willamette Valley Forests (NA0417); Blue Mountains Forests (NA0505); Central and Southern Cascades Forests (NA0508); Central Pacific Coastal Forests (NA0510); Eastern Cascades Forests (NA0512); Puget Lowland Forests (NA0524); and Snake-Columbia Shrub Steppe (NA1309) (see Figures 1 and 2).

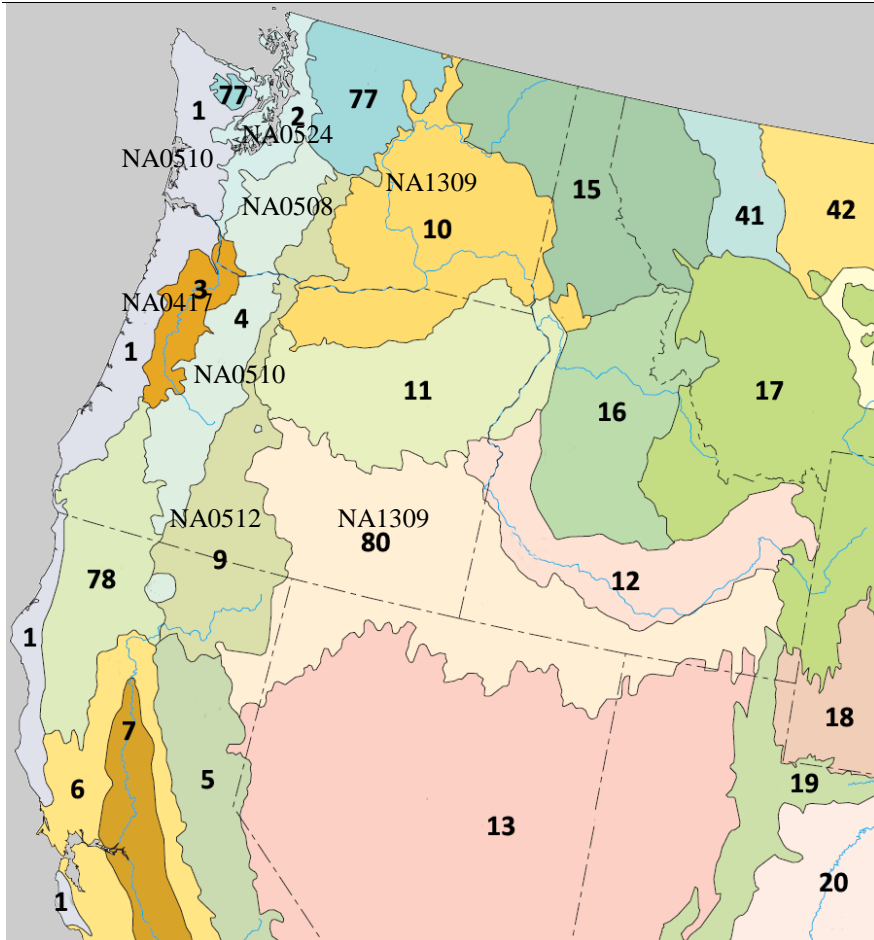


Figure 2. WWF ecoregions in the area of operation of CVC

- NA0417 – Willamette Valley Forests
- NA0505 – Blue Mountains Forests
- NA0508 – Central and Southern Cascades Forests
- NA0510 – Central Pacific Coastal Forests
- NA0512 – Eastern Cascades Forests
- NA0524 – Puget Lowland Forests
- NA1309 – Snake-Columbia Shrub Steppe

***Conservation status of the Ecoregion: Willamette Valley Forests (NA0417)***

The Willamette Valley Forests ecoregion is not identified as a priority ecoregion for global conservation via the WWF Global 200 ecoregional conservation priority setting. It is not recognized in the





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Conservation International Biodiversity Hotspot assessment [6-8], and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10].

WWF has assessed the conservation status of the ecoregion to be “critical/endangered”. Concerns about the ecoregion are focused on conversion of the native grasslands and oak savannas. Logging is not identified as a threat to the important components of the ecoregion [11] and conservation recommendations center around protection of prairie and wetland areas. Since the area has not been identified in the global schemes mentioned in Annex 2 of the standard and logging is not cited as a threat to the ecoregion, wood procurement from this area is considered low risk.

***Conservation status of the Ecoregion: Blue Mountain Forests (NA0505)***

The Blue Mountain Forests ecoregion is not identified as a priority ecoregion for global conservation via the WWF Global 200 ecoregional conservation priority setting. It is not recognized in the Conservation International Biodiversity Hotspot assessment [6-8], and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10].

WWF has assessed the conservation status of the ecoregion to be “critical/endangered”. Concerns about the ecoregion are focused on logging and overgrazing. Logging over the past century including extensive logging of old growth, salvage logging, and fire suppression has resulted in extensive threat to riparian species (mostly fish) and compromised forest ecosystem health [12]. However, since the area has not been identified in the global schemes mentioned in Annex 2 of the standard and logging is not cited as a threat to the ecoregion, wood procurement from this area is considered low risk.

***Conservation status of the Ecoregion: Central and Southern Cascades Forests (NA0508)***

The Central and Southern Cascades Forests ecoregion is not identified as a priority ecoregion for global conservation via the WWF Global 200 ecoregional conservation priority setting. It is not recognized in the Conservation International Biodiversity Hotspot assessment [6-8], and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10].



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WWF has assessed the conservation status of the ecoregion to be “vulnerable”. The ecoregion is noted to have intermediate levels of biodiversity. Logging is noted to be the primary threat to ecoregional conservation values, but these are not determined to be severe [13]. There are extensive federal holdings in the area that are designated wilderness areas and offer substantial protection to ecoregional values. Since the area has not been identified in the global schemes mentioned in Annex 2 of the standard and logging is not cited as a threat to the ecoregion, wood procurement from this area is considered low risk.

***Conservation status of the Ecoregion: Central Pacific Coastal Forests (NA0510)***

The Central Pacific coastal forests ecoregion is included in the WWF Global 200 ecoregional conservation priority setting as part of the Pacific Temperate Rainforests configuration [14-16]. It is not recognized in the Conservation International Biodiversity Hotspot assessment [6-8], and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10]. Wood procurement from this area is considered low risk.

WWF has assessed the conservation status of the ecoregion to be “critical/endangered”. Human activity, particularly clearcut logging, plantation forestry, road building, agriculture, and development have heavily altered the Central Pacific Coastal Forests. Only about 4 percent of the region remains as intact habitat. Some ecosystem types, such as the coastal temperate rainforests in Oregon, have been virtually destroyed (Kellogg 1992). Several relatively large blocks of more or less intact habitat remain, as do a number of smaller patches.

Columbia Vista sources from forests managed under the Oregon and Washington State Forest Practice Laws and as such considers wood procurement from this area to be considered low risk.

***Conservation status of the Ecoregion: Eastern Cascades Forests (NA0512)***

The Eastern Cascades Forests ecoregion is not identified as a priority ecoregion for global conservation via the WWF Global 200 ecoregional conservation priority setting. It is not recognized in the Conservation International Biodiversity Hotspot assessment [6-8], and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10].

WWF has assessed the conservation status of the ecoregion to be “critical/endangered”. The ecoregion is noted to have intermediate levels of



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biodiversity but is home to higher numbers of federally listed species (many fish). Logging is noted to be the primary threat to the ecoregional conservation values [18]. Most of the forested areas in the ecoregion are in the USFS and recent forest practices on forest service land have been beneficial to augment late-seral forests. Since the area has not been identified in the global schemes mentioned in Annex 2 of the standard, narrow interpretation of the standard allows wood procurement from this area to be considered low risk.

### ***Conservation status of the Ecoregion: Puget Lowland Forests (NA0524)***

The Puget Lowland Forests ecoregion is not identified as a priority ecoregion for global conservation via the WWF Global 200 ecoregional conservation priority setting. It is not recognized in the Conservation International Biodiversity Hotspot assessment [6-8], and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10].

WWF has assessed the conservation status of the ecoregion to be “critical/endangered”. The ecoregion is noted to have intermediate levels of biodiversity and is given a status of endangered due primarily to urbanization and the associated disturbances (pollution, recreation, invasive species, etc.) [21]. Since the area has not been identified in the global schemes mentioned in Annex 2 of the standard, and logging is not identified as a primary threat to the ecoregion, wood procurement from this area is considered low risk.

Columbia Vista only sources from the lower areas of the Puget Lowland ecoregions. Columbia Vista will only source logs from Lewis county and counties South of Lewis that are located within the Puget Lowland ecoregion.

### ***Conservation status of the Ecoregion: Snake-Columbia Shrub Steppe (NA1309)***

The Snake-Columbia Shrub Steppe ecoregion is not identified as a priority ecoregion for global conservation via the WWF Global 200 ecoregional conservation priority setting. It is not recognized in the Conservation International Biodiversity Hotspot assessment, and it is not recognized by the IUCN and Smithsonian Institution as a Centre of Plant Diversity (see Figure 5) [9, 10].

WWF has assessed the conservation status of the ecoregion to be

“critical/endangered”. Threats to the ecoregional values include overgrazing by domestic livestock, invasive plant species, irrigated agriculture, and ATV recreational use. Logging is not identified as a threat to the important components of the ecoregion [22] and conservation recommendations center around lessening cattle pressures and slowing spread of exotic species. Wood procurement from this area is considered low risk.

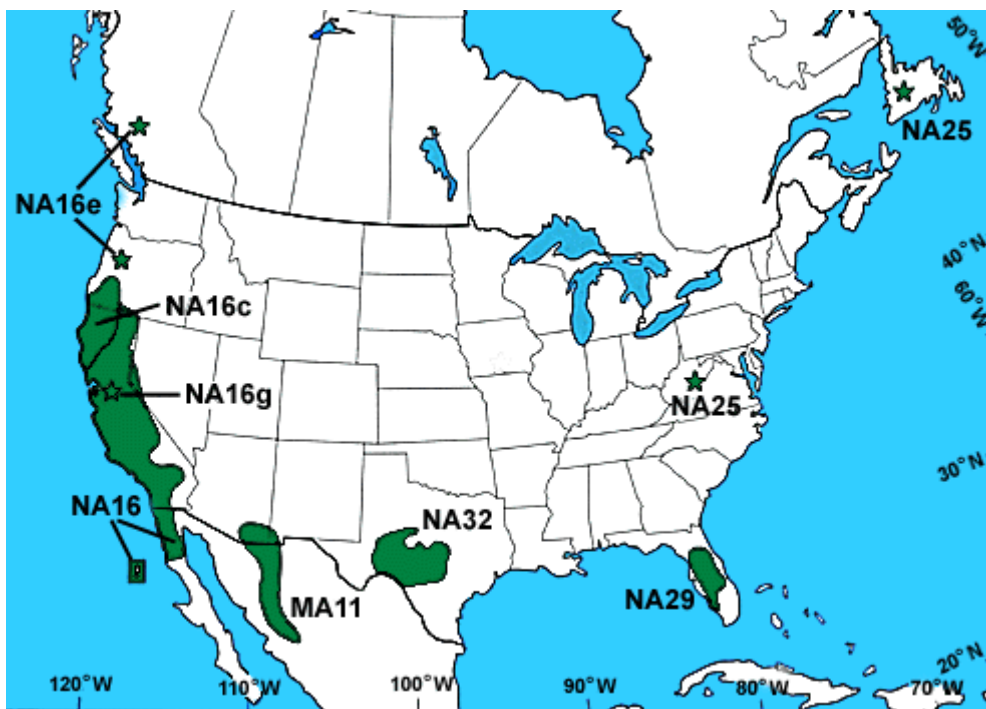


Figure 5. Smithsonian Institution / IUCN Centers of Plant Diversity for North America [9]. Overlap occurs in the northern section of the California Floristic Province Center of Plant Diversity.

***WRI/Global Forest Watch Frontier Forest***

There are no Frontier forests in the CVC Woodshed

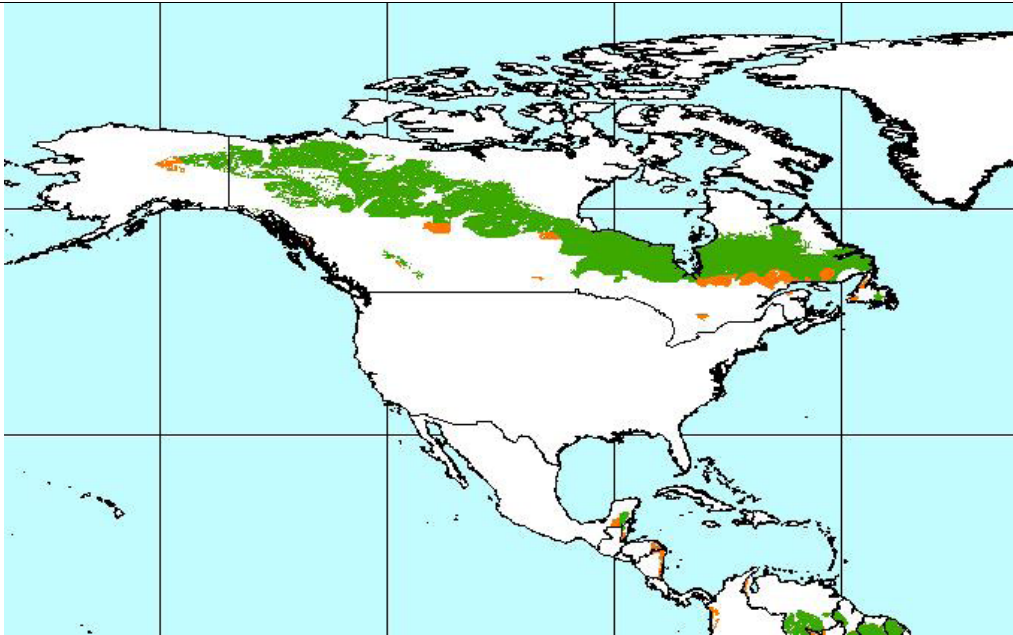


Figure 6. Global Forest Watch Frontier Forests in North America. The areas in green are designated as low/no risk by Global Forest Watch. The areas in orange are designated as high risk [23].

### ***Greenpeace Intact Forests***

There is slight overlap between the CVC woodshed and the Greenpeace Intact Forests in British Columbia, Washington, Oregon, and California [24, 25].

## **D) Wood harvested in forests being converted to plantations or nonforest Use**

### **Summary of findings**

One can conclude that the supply areas of origin as described as the CVC Woodshed are LOW RISK in relation to threat of conversion to plantations or non-forest use through compliance with Criterion 4.1. This determination is based on the following:

1. Forest cover in the ecoregions that encompass CVC Woodshed show no significant trends of forest cover loss (or of loss greater than 0.5% annually).

### **Assessment**

The process of determination of risk in the category of conversion is via



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analysis of data assessing forest cover over time. Once an appropriate geographic scope for an “area” has been chosen by the user, the area is investigated for natural forest cover trends at the ecoregional level. Data are available at the national level for nearly every country and at the subnational level for many.

Issues may arise in terms of both spatial and temporal variation in interpretation. For example, one may argue that the United Kingdom has a negative trend in natural forest cover since the 1800s, but, since 1990 there may be no negative trend in forest cover.

Identifying a state or a county as having rates of conversion above 0.5% per year does not necessarily define a region as high risk. The Controlled Wood risk criteria identify an area as high risk if the rate of loss of forests exceeded this rate in the ecoregion.

There are in the neighborhood of 30-70 terrestrial ecoregions in the continental U.S. – the number varies depending on the source and definition used for ecoregion. The scale, source, and definition of ecoregion are not specified explicitly in the standard, so users are allowed to choose the delineation. Among the several sources that can be used to assist in identifying ecoregions, the most prominent include the U.S. Forest Service, WWF, and TNC.

#### Assessment Methodology:

US Forest Service Ecoregions were used to assess risk for conversion due to the availability of data on forest cover change over time [29]. The standard defines ecoregion as:

“A large area of land or water that contains a geographically distinct assemblage of natural communities that

1. Share a large majority of their species and ecological dynamics;
2. Share similar environmental conditions, and;
3. Interact ecologically in ways that are critical for their long-term persistence.”

US Forest Service ecosystem supply areas or provinces meet the elements of this definition. A risk assessment at the supply area level would be valid to assess the criterion for conversion; however, for this risk assessment, the analysis was performed at the finer or province scale.

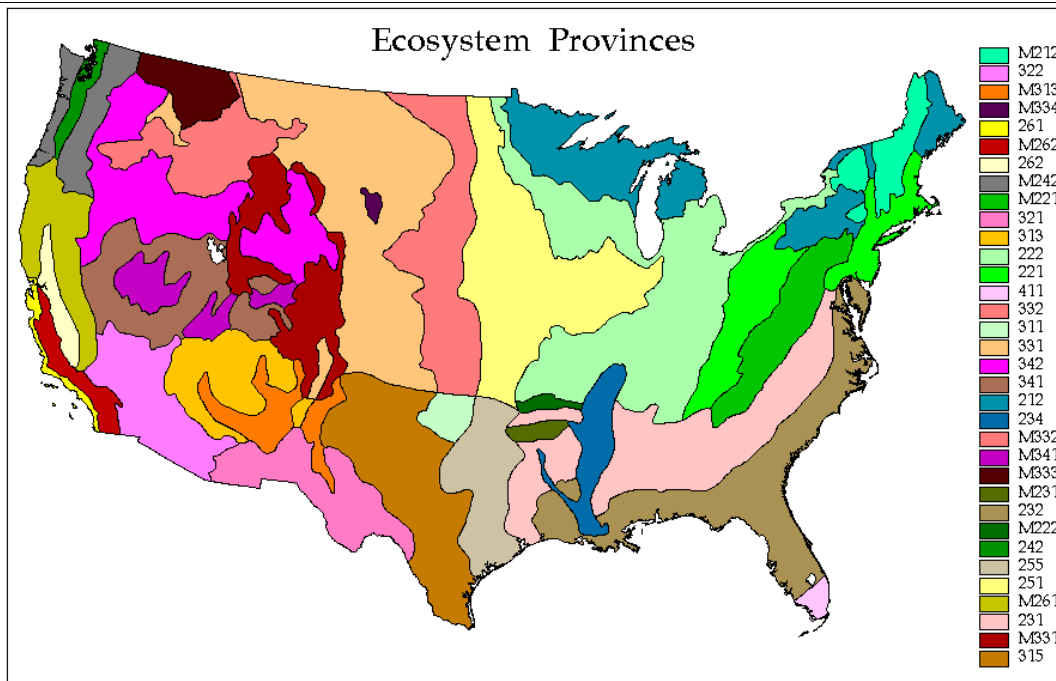


Figure 15. Ecoregions of the United States:

Source: [http://www.fs.fed.us/colorimagemap/ecoreg1\\_provinces.html](http://www.fs.fed.us/colorimagemap/ecoreg1_provinces.html)

The data from the Forest Service was re-projected from Albers to Decimal Degrees using ArcTools.

The resulting county list was used to assess forest cover changes through data supplied by the USFS Forest Inventory & Assessment. The results of the analysis of the inventory follow and are included as a table in this section. Based on the data available one can conclude that the ecoregions where wood is procured for the CVC woodshed can be considered to be low risk for conversion..

### **E) Wood from forests in which genetically modified trees are planted** **Summary of Findings**

One can come to the conclusion that the supply areas of origin as described as the CVC woodshed are LOW RISK in relation to threat of GMO trees use through compliance with Criterion 5.a. This determination is based on the following:

1. No GMO species used in paper production has been approved for commercial use in U.S.





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## **Assessment**

An area is high risk for GMO wood when there is commercial use of GMO trees of the same species as the purchased wood in the country or supply area, but can be determined as low risk if licenses are required for commercial use and there are no licenses, or if GMO trees are forbidden for use in the country concerned.

In the U.S. the Animal Plant and Inspection Service (APHIS) of the Department of Agriculture is responsible for regulating the introduction of genetically engineered organisms. Introduction is defined as any importation or movement through the country, or release into the environment that is outside an area of physical confinement. By regulation, GE organisms are considered to be a potential plant pests until a review process demonstrates that they do not pose a risk as pests.

A developer of GE crops, including trees, must obtain authorization from APHIS before introduction. An applicant must submit all plans for movement, importation, or field testing for review. Developers must then adhere to specific criteria and performance standards before proceeding with trials. Developers must provide information on the GE crop including all the new genes and products that will be produced, the purpose of the test, how the test will be conducted and precautions to prevent escape of the crop from the field-test site. Environmental assessments are required for some crops as determined by APHIS. All field trials are subject to inspection.

After a GE crop has been field tested extensively it can receive nonregulatory status where the crop is deregulated. The developer must show that the crop or product does not pose a plant pest risk and can be safely removed from oversight. APHIS requires a petition be submitted and develops an environmental assessment to analyze the potential impacts the crop may have on the environment and seeks public comment. The Bureau of Regulatory Services of APHIS publishes Federal Registry notices that a 60 day public comment period for the environmental assessment and the petition is in place. When a finding of no significant impact is made the crop or product receives nonregulatory status. This means the crop or product can be freely moved and planted without permits or other regulatory oversight. At this point the crop can be commercialized.

There have been over 350 approved field trials of GE trees (more than 20 species in all) plus more than 100 trials with other woody plant species. Although genetically modified Populus, Robinia, and other tree species have been created, there is no known commercial source of genetically modified





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planting stock in the CVC woodsheds for private landowners or others engaged in forest management.

While there have been extensive experimental trails in the U.S. of GE trees, no species is used in production of wood products has been approved for commercial use. This was confirmed through searching U.S. the Animal Plant and Inspection Service (APHIS) database for the U.S.. It can then be concluded that the supply areas of origin for CVC can be considered to be LOW RISK in relationship to wood being sourced from forests in which genetically modified trees are planted.

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