

National Wood Flooring Association

Responsible Procurement Program

Program Document



January 1, 2019

Program Purpose

The National Wood Flooring Association's Responsible Procurement Program (RPP) is a program for wood flooring manufacturers who are committed to producing and promoting wood floors that come only from environmentally and socially responsible sources, improving forest sustainability for future generations.

To accomplish this, the RPP has been designed to:

- Enable participating companies to exercise environmental responsibility in their sourcing, encompassing ALL wood products that they procure;
- Help companies transition over time to products certified to the standards of the Forest Stewardship Council (FSC);
- Provide options for exercising due care under the US Lacey Act;
- Provide RPP participants with effective marketing support including use of a program logo.

Key Program Elements

The RPP is:

- 1) open to all companies in the U.S. wood flooring industry and broader U.S. hardwood industries who wish to participate;
- 2) voluntary;
- 3) transparent;
- 4) verified through independent third-party auditing

The RPP is designed for manufacturers of hardwood flooring, but it can also be used by primary manufacturers (operations such as sawmills and veneer mills that use hardwood logs as inputs to their production).

Program Tiers

The RPP provides progressive “tiers” that act like rungs on a ladder on which participants can move gradually upward toward ever-higher levels of social and environmental performance.

Tier 1

Tier 1 is the starting place for all RPP participants:

- 1) The company prepares for and undergoes an RPP Chain-of-Custody (CoC) audit. Technical assistance in preparing for the audit is provided by NWFA. All RPP CoC audits shall be conducted by an RPP-approved certifier (see Appendix 1). A key goal of the RPP CoC system is to ensure that wood flooring and other wood products can be matched to Source Types that meet Program requirements.
- 2) If an RPP participant manufactures (either domestically or overseas) wood flooring or other hardwood products made from raw materials originating from U.S. states where hardwood timber growth exceeds total hardwood timber harvest and mortality (see Appendix 2), then they are entitled to use the *U.S. Renewing Forests* label to promote qualifying products or product lines. For guidelines, see the RPP Style Guide.
- 3) If an RPP participant manufactures or imports wood flooring or other wood products made from raw materials originating in countries other than the U.S., they shall have a written Standard Operating Procedure (SOP) for exercising “due care” in conformance with the Lacey Act that has been reviewed and approved by NWFA.

Tier 2

Tier 2 represents the next level of commitment and achievement in the RPP. Program participants shall advance to Tier 2 as rapidly as they are able, but must do so within three years of the date of issuance of their RPP Chain-of-Custody (CoC) certificate.

- 1) The RPP participant obtains FSC Chain-of-Custody (CoC) certification, which in turn requires an annual on-site audit conducted by an FSC-accredited certifier - see Appendix 1. RPP CoC certification does not have to be maintained separately once FSC CoC certification is in place, provided that the FSC-accredited certifier expands the scope of the certification audits to include all applicable RPP requirements.
- 2) By sourcing from FSC-certified forests, the company must actively manufacture and/or trade FSC-certified products and must establish concrete targets to increase its sales of FSC-certified products over time. See the section below on Benchmarking and Accountability.

Tier 3

The highest level of achievement in the RPP is Tier 3. This level is intended to recognize outstanding leadership in realizing the goals of the RPP and is reserved for Program Participants who meet all Tier 1 and Tier 2 requirements, and who achieve 25% or more of their sales as FSC certified.

Labeling and Promotion

The RPP offers its own eco-label: *Verified from U.S. Renewing Forests*.



The *U.S. Renewing Forests* label means that raw materials originate from U.S. forest regions where hardwood growth exceeds removal at the statewide level.

For further information on the RPP label and its usage, see the RPP Style Guide. Use of the RPP label is reserved for Program participants. All uses of the RPP label and promotional claims related to RPP products and Program participation – whether on product, product packaging, literature, brochures, samples, or displays – must comply with the RPP Style Guide.

Another label relevant to the RPP is that of the FSC. Only companies that have obtained FSC CoC certification can use the FSC label and make FSC promotional claims. For more information, contact an FSC-accredited certifier (Appendix 1).

Engineered Wood Flooring and Mixed Sources

In order to qualify for the *Verified from U.S. Renewing Forests* label, all of the wood used in engineered wood flooring or other products that combine components from different sources must meet the requirements for use of the label.

Benchmarking and Accountability

All participants in the RPP will start out by evaluating their suppliers and the origins of wood supplied. Based on this evaluation, the RPP participant shall broadly classify each of its product lines into one (and only one) of the following Source Types:

- 1) FSC Certified
- 2) U.S. Renewing Forests
- 3) Other Acceptable
- 4) Unknown

This initial evaluation and classification will constitute a baseline for measuring progress toward fulfillment of Program goals. After the baseline is established, participants will establish objectives for future sales (by percentage of overall sales rather than in absolute terms) for products in each Source Type. These benchmarks will be established through the cooperation and to the mutual satisfaction of NWFA and each RPP participant. NWFA also works with RPP participants to ensure that benchmarking is ambitious yet achievable, as accountability is central to the credibility of the Program.

The overarching goal of the benchmarking and accountability process is to increase the supply of hardwood and other products that meet program requirements and, eventually, the requirements of FSC certification.

Continuous Progress

Program participants commit to continuous progress, both of sales of approved products and within the tiered framework of the Program. It is expected that Program participants will progress from Tier 1 to Tier 2 within three years of the date of issuance of their RPP Chain-of-Custody (CoC) certificate, although if they can advance sooner, they shall. Progress from Tier 2 to Tier 3 is also encouraged in the shortest possible time frame, but the requirement is open-ended given the nature of Tier 3 requirements.

Failure to progress from one Tier to the next without reasons that NWFA deems valid may be grounds for removal from the Program. Similarly, a failure to

progress toward established benchmarks for increased sales of products (as a percentage of overall sales, not in absolute terms) that comply with Program requirements is also contrary to the goals and spirit of the RPP, and could result in probation or removal.

Naturally, companies that are making good faith efforts to progress from one Tier to the next and/or to meet benchmarks for increasing sales of qualifying products, but are unable to do so for reasons beyond their control, will be granted extensions or exemptions.

Appendix 1: RPP-Approved and FSC-Accredited Certifiers

As of the date on this document, the following certifier is approved by NWFA to perform RPP Chain of Custody audits:

SCS
2000 Powell St., Ste. 600
Emeryville, CA 94608
Ph: 510-452-8000
<http://www.scscertified.com/>

For a complete list of FSC-accredited certifiers active on the US to whom Program participants can turn to fulfill Tier 2 requirements:

<https://us.fsc.org/en-us/certification/certifying-bodies-in-the-us>

Appendix 2: Determining Eligibility for Use of the Verified from US Renewing Forests Label

RPP participants are entitled to use the *U.S. Renewing Forests* label to promote products manufactured (either domestically or overseas) from wood originating from hardwood producing U.S. states where timber growth exceeds total hardwood timber harvest and mortality. The basis for this list is the American Hardwood Export Council's Interactive Forest Map (<https://www.americanhardwood.org/index.php/environmental-profile/interactive-forest-map>) which is based in turn on the most recently available 5 year USDA FIA statistics.

As of January 1, 2019, the list of eligible states is as follows:

Alabama	Mississippi
Arkansas	Missouri
Connecticut	New Hampshire
Florida	New Jersey
Georgia	New York
Illinois	North Carolina
Indiana	Ohio
Iowa	Pennsylvania
Kentucky	Rhode Island
Louisiana	South Carolina
Maine	Tennessee
Maryland	West Virginia
Massachusetts	Wisconsin
Michigan	Vermont
Minnesota	Virginia