

National Wood Flooring Association

Responsible Procurement Program

Program Document



**National
Wood Flooring
Association**

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Program Purpose

The National Wood Flooring Association's Responsible Procurement Program (RPP) is a joint initiative between leading environmental groups and industry manufacturers 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 procurement process;
- 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 and broader U.S. hardwood industries who wish to participate;
- 2) voluntary;
- 3) transparent;
- 4) intended to bring about real change in the wood products trade;
- 5) verified through independent third-party auditing

The RPP was conceived and is administered by the National Wood Flooring Association (NWFA). Scientific Certification Systems (SCS) played a central role in the development of the program from its inception. The RPP has also benefited from the input of other RPP strategic partners, including Forest Stewardship Council U.S., and Rainforest Alliance – see Appendix 1.

The governing entity of the RPP is its Governing Board. For more information on the Board and its functions, see Appendix 2.

The RPP is currently designed for secondary manufacturers of hardwood flooring as well as the primary manufacturers (operations such as sawmills and veneer mills that use hardwood logs as inputs to their production) that supply them with raw materials.

Participation in the RPP is not to be taken lightly. It entails serious commitments on the part of all companies who choose to participate. However, we believe that the near- and long-term benefits for Program participants and for our industry far outweigh any burdens involved.

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 NWFPA. All RPP CoC audits shall be conducted by an RPP-approved certifier (see Appendix 4). 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. See RPP guidance documents for details.

- 2) If an RPP participant manufactures (either domestically or overseas) wood flooring or other hardwood products made from raw materials originating from States in the U.S. where hardwood timber growth exceeds total hardwood timber harvest and mortality,¹ then they are entitled to use the

¹ The RPP will use the published 2007 release of USDA FIA statistics for estimated volume of growth, estimated volume of removals and estimated volume of mortality for companies entering the program until the release of 2012 USDA FIA statistics. If RPP participants can access FIA data for a given state that has been classified as ‘non-

U.S. Renewing Forests label in off-product claims only for qualifying products or product lines. For guidelines, see the RPP Style Guide.

- 3) If an RPP participant is a manufacturer or importer of wood flooring or other hardwood products made from raw materials originating in countries other than the U.S., then as part of exercising “due care” per the amended Lacey Act and similar legislation outside of the U.S., the company must engage with one or more RPP-approved organizations that provide legality risk assessment, guidance, training, management and/or verification services - see Appendix 3.
- 4) Before they can advance to Tier 2, an RPP participant must demonstrate that they have taken appropriate measures as stipulated by an RPP-approved legality resource provider to assess and manage the risk of all products whose materials originate in countries other than the U.S.

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 Certification Body - see Appendix 4. 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
- 2) By sourcing from FSC-certified forests, the company must actively manufacture and/or trade FSC-certified products and must establish concrete

renewing’ (removals and mortality exceed growth) and show that based on the most recent 5-year average the state should be reclassified as “renewing” (growth exceeds removals and mortality), then the RPP governing will consider this information as appropriate.

² If the RPP participant does not have adequate FSC supply in its “wood basket,” an exemption to this requirement can be sought with the RPP Governing Board.

targets to increase its sales of FSC-certified products over time. See the section below on Benchmarking and Accountability.³

- 3) The RPP participant agrees to support the work of the FSC Procurement Group (see the end of the body of this document).

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 50% or more of their sales as FSC certified.

Program participants are encouraged to achieve Tier 3 as quickly as possible, but given how high the bar is set, the time frame for doing so is flexible.

Labeling and Promotion

The RPP introduces a new label into the marketplace: *Verified from U.S. Renewing Forests*.



³ Per the above, an exemption to this requirement can be sought with the RPP Governing Board.

Use of the RPP label is only allowed in off-product claims – that is, the label cannot be applied to wood flooring and other finished products themselves, but can only be used in promotional and marketing materials such as websites, brochures, and merchandising.

At the option of the RPP participant, boxes or bundles of wood flooring and other finished products can bear a code that will be issued by NWFA after the company has successfully passed an RPP CoC audit.

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. This is, by its nature, a generalized claim based on the aggregation of large amounts of data and is NOT intended to imply that the forests of origin are “responsibly,” “sustainably,” and/or “well” managed at the level of the individual management unit.

Finally, it is important to note that the RPP is structured in such a way that the label is transitional and intended to give way, in due course, to FSC certification.

For further information on the RPP label and its usage, see the RPP Style Guide. Use of the RPP label in off-product claims is reserved for Program participants. All uses of the RPP label and promotional claims related to RPP products and Program participation – whether on product 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 (a Tier 2 requirement) can use the FSC label and make FSC promotional claims. For more information, contact an FSC-accredited certifier (Appendix 2).

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 may combine material from different sources must meet the underlying 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) Unknown/Unacceptable
- 2) FSC Certified
- 3) U.S. Renewing Forests
- 4) Other Acceptable

Further information on the evaluation process and on classifying by Source Types can be found in the RPP Guidance Documents and the RPP Standard.

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 the RPP auditor and each RPP individual. NWFAs also work with RPP partners 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.

The baselines and benchmarks of individual Program participants will be aggregated to form the overall baseline and benchmarks by which NWFAs and its partners will measure and judge the progress and success of our Responsible Procurement Program.

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.

If, subsequent to its initial RPP CoC audit, a Program participant has satisfied (or clearly has the ability to satisfy) all of the requirements to progress from one Tier to the next, then the Company shall advance to the next Tier no later than by the time of its next RPP CoC audit.

Failure to progress from one Tier to the next without reasons that NWFA deems valid and persuasive 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, depending on circumstances and the judgment of the RPP Governing Board.

FSC Procurement Group

The FSC Procurement Group plays a central role in the long-term success of the RPP. The goal of the Procurement Group is to assist in developing programs to overcome the barriers to the FSC certification of family forest lands across the hardwood region of the U.S., as family forest lands are a major source of raw material supply for our industry. The FSC Procurement Group is constituted of representatives of RPP participants and other organizations that support its mission

The guiding and planning entity for the FSC Procurement Group is its Steering Committee. For more information on the Committee, see Appendix 2.

Appendix 1: Strategic Partners

RPP strategic partners include Scientific Certification Systems (SCS), Forest Stewardship Council U.S. (FSC-US), and Rainforest Alliance.

- ✓ SCS is a leading third-party provider of certification, auditing and testing services, and standards development whose goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors and to stimulate continuous improvement in sustainable development. SCS is an FSC-accredited certifier, and provides numerous other verification services, including legality verification. SCS is the Preferred Provider for the NWFA RPP.
- ✓ FSC-US is the national initiative of the Forest Stewardship Council, an independent, non-governmental, not for profit organization established to promote the responsible management of the world's forests. The RPP recognizes Forest Stewardship Council (FSC) certification as the leading standard for environmentally and socially responsible forestry and forest products.
- ✓ Rainforest Alliance TREES (TRaining, Extension, Enterprises & Sourcing) US Program works with small- to medium-sized enterprises (SMEs) and local communities to maximize their investment in certification and related forest sustainability initiatives, involving individuals and groups along the entire spectrum of forestry-related activities, from landowners, loggers, foresters and wood processors to paper producers, architects and builders. Linking them with governmental agencies, educational institutions, and service providers, TREES works to provide sustainable forestry businesses with the tools they need to succeed, increase awareness of the issues and forge the connections that will ensure the success of their COC certification strategy. TREES is a program of the Rainforest Alliance.

Appendix 2: RPP Governing Board and FSC Procurement Group Steering Committee

The RPP Governing Board is the governing entity of the RPP. Its functions include the following:

- Approving any major changes to the RPP program design
- Approving and assisting in expansions of the RPP to other sectors of the hardwood industry
- Review of RPP manufacturer participants' compliance/performance
- Certifier oversight and performance review

As of the date on this document, its members are as follows:

Don Finkell, Anderson Hardwood Floors, Chairman
Corey Brinkema, FSC- US
Robert Hrubes, Scientific Certification Systems, Inc.
Michael Martin, NWFA
Neil Poland, Mullican Flooring
Jason Grant, NWFA Advisor

The FSC Procurement Group Steering Committee is the guiding entity for the Group. Its functions include planning the activities of the Group and, in some cases, executing those activities. As of the date on this document, its members are as follows:

Neil Poland, Mullican Flooring, Chairman
Don Finkell, Anderson Hardwood Floors
Lisa Stocker, Domtar
Jason Grant, NWFA Advisor
Ian Hanna, Forest Stewardship Council US
Robert Hrubes, Scientific Certification Systems, Inc.
Michael Martin, NWFA
Linda Kramme, World Wildlife Fund US
Paul Pingrey, Forest Stewardship Council US
Fran Price, The Nature Conservancy
Eric Smith, Kapstone Paper

Appendix 3: Guidance for Exercising Lacey “Due Care” under the RPP

Tier 1 of the RPP requires that companies engage with an one or more RPP-approved organizations that provide legality guidance, risk assessment, risk management, training, and/or verification resources or services toward exercising “due care” per the amended Lacey Act and similar legislation outside of the U.S.

As of the date on this document, the RPP-approved legality resource providers are as follows:

Scientific Certification Systems

Contact: Neil Mendenhall

510-452-8000

NMendenhall@scscertified.com

www.scscertified.com/nrc/legalharvest.php

Rainforest Alliance

Contact: Ron Wald

(507) 663-1115

rwald@ra.org

www.rainforest-alliance.org/forestry/verification/legal

The Forest Trust

Contact : Robin Barr

206-330-7528

r.barr@tft-forests.org

www.tft-forests.org/

Appendix 4: RPP-Approved and FSC-Accredited Certifiers

As of the date on this document, the following certifiers are 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.scs-certified.com/>

For a complete list of FSC-accredited certifiers to whom Program participants can turn to fulfill Tier 2 requirements, see this [List of FSC-Accredited Certifiers](#)

The FSC-accredited certifiers presently active in the U.S. are:

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

SmartWood
801 Hwy 3 N., Ste. 200
Minneapolis, MN 55057
Ph: 507-663-1115
<http://www.rainforest-alliance.org/forestry.cfm?id=certification>

SGS North America
201 Route 17 North
Rutherford, NJ 07070
Ph: 201-508-3000
http://www.us.sgs.com/forestry_certification_us

Bureau Veritas
515 West Fifth St.
Jamestown, NY 14701
Ph: 800-937-9311
<http://www.us.bureauveritas.com>