

# Responsible Procurement Program (RPP)

## Standard RPP-STN-V3-0

January 1, 2019

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### **A Scope**

This Standard stipulates practices for responsible procurement of wood for the purposes of demonstrating conformance to the Responsible Procurement Program (RPP). This standard is applicable to all manufacturers making RPP claims or using the RPP *U.S. Renewing Forests* label.

This document specifies the minimum requirements for an organization's quality management, source verification, and chain of custody systems aimed at ensuring that products offered under (i.e. identified with) the NWFA's Responsible Procurement Program are sourced from one of the following acceptable *source types*:

- 1) FSC-Certified
- 2) U.S. Renewing Forests
- 3) Other acceptable sources

Definitions and requirements for each of the above *source types* are defined within the body and appendices of this standard.

### **B Effective Date of Standard**

Effective January 1, 2019, must be implemented by January 1, 2020: Applicant organizations seeking acceptance into the RPP must be independently confirmed to comply with this Standard prior to making any membership claims or use of the RPP *U.S. Renewing Forests* label.

### **C References**

Responsible Procurement Program (RPP) Program Document 2019; and  
FSC Chain of Custody Standard (FSC-STD-40-004 V3-0)

### **D Terms and Definitions**

Annex 1 provides a glossary of the terms and definitions used throughout this Standard which have been kept consistent with credible chain of custody standards and due diligence systems for forest legality.

### **E Important Notes on the Use of this Standard**

This Responsible Procurement Program Standard works in concert with the Responsible Procurement Program Document and the FSC Chain of Custody Standard referenced in Section C above. In many cases, requirements overlap and this Standard can be fulfilled wholly or partially by complying with compatible chain of custody requirements.

# 1. Quality System

## 1.1. Company Procurement Policy

1.1.1. The Company shall post on its website a Procurement Policy, endorsed by top management, to eliminate *unknown sources* and to show preference for *acceptable sources*<sup>1</sup> which include:

- a) *FSC Certified* – Wood certified to the FSC *Chain of Custody* standard
- b) *U.S. Renewing Forests* – Wood originating from states within the United States of America where the volume of hardwood growth is equal to or greater than that of mortality and removals.<sup>2</sup>
- c) *Other Acceptable Sources*
  - i. wood imported into the United States of America that is linked to a corresponding USDA APHIS Plant and Plant Product Declaration Form and covered by an NWFA-approved *forest legality standard operating procedure*
  - ii. *Post-consumer recycled/reclaimed wood*
  - iii. *Pre-consumer/post-industrial recycled/reclaimed wood*
  - iv. *Salvaged wood*

## 1.2. Complaints Mechanism

1.2.1. The Company shall ensure that complaints and disputes about the classification of sources procured or products sold by the Company, with the goal of eliminating the use of wood from sources other than those in Section 1.1.1 above, are adequately considered, including the following:

- a) All complaints shall be evaluated and responded to within 2 weeks.
- b) All complaints shall be investigated within 2 months.
- c) If any complaint reveals wood not in line with the Company's Procurement Policy, the Company shall immediately halt the purchase of that wood.
- d) Records of all complaints and actions taken shall be kept.

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<sup>1</sup> See RPP Glossary of terms and Section 2.2 for more information on the RPP definitions of these source types.

<sup>2</sup> The NWFA keeps a list of renewing forests that qualify. As of the effective date of this standard, 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 for estimated volume of timber growth, estimated volume of removals, and estimated volume of mortality. Additionally, an Company may demonstrate 'renewing status' (growth is equal to or greater than removals and mortality) for a state using more recent electronic FIA endorsed statistics.

### 1.3. Documented Procedures & Work Instructions

- 1.3.1. The Company shall document and keep up-to-date procedures and/or work instructions to demonstrate compliance with all parts of this Standard.<sup>3</sup>
- 1.3.2. The Company shall appoint a representative as the RPP Administrator with responsibility over the entire RPP wood procurement and *chain of custody* system.
- 1.3.3. The Company shall clearly list responsible persons or positions for each task or set of tasks identified in the procedures/or work instructions.

### 1.4. Training

- 1.4.1. The Company shall provide training to all relevant staff per a documented procedure and per a written schedule to ensure compliance with the Standard.

### 1.5. Record Keeping

- 1.5.1. The Company shall maintain records for at least 5 years to demonstrate compliance with all sections of this Standard.

### 1.6. Internal Audits and Management Review

- 1.6.1. The Company shall conduct internal audits and management reviews prior to the initial audit and at least annually to ensure a well-functioning procurement and *chain of custody* system.

### 1.7. Participating Facilities

- 1.7.1. The Company shall develop a comprehensive list of facilities (e.g. manufacturing, warehousing, administration, etc.) that will participate in the RPP, including the addresses and telephone numbers for each.

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<sup>3</sup> Procedures and work instructions to meet this Standard can be integrated with a Company's ISO or FSC procedures if applicable.

## 2. Material Sourcing & Verification

### 2.1. Supplier Notification

- 2.1.1. The Company shall formally notify its suppliers of the Company's Procurement Policy.
- 2.1.2. The Company shall obtain completed and signed RPP Supplier Declaration Forms<sup>4</sup> from all suppliers<sup>5</sup> of wood.
  - a) A new declaration shall be produced at least every 5 years and if there are any changes which affect the original declaration.
  - b) The declaration must be confirmed annually.

### 2.2. Classification of Wood Products

- 2.2.1. Company shall classify its supplies of wood into one of the following *Source Types* based on the requirements specified for each type below:
  - a) *FSC Certified* – Documented by conforming sales and transport documents from suppliers.
  - b) *RPP US Renewing Forests* –
    - i. Supplied by a current and valid RPP Certified supplier where *RPP US Renewing Forests* wood is identified on invoices and shipping documents per Section 5 of this standard, OR
    - ii. Covered by an annually verified RPP Supplier Declaration Form from a direct *primary supplier*
  - c) *Other Acceptable Sources* –
    - i. Linked to a corresponding USDA APHIS Plant and Plant Product Declaration Form covering the shipment of any wood imported into the United States of America **and**, where the wood is covered by an NWFAs-approved *forest legality standard operating procedure (SOP)*, OR
    - ii. Linked to evidence demonstrating that the wood meets the definitions of *post-consumer recycled/reclaimed wood, pre-consumer/post-industrial recycled/reclaimed wood, or salvaged wood* per Appendix 1 of this Standard.

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<sup>4</sup> See Appendix 3

<sup>5</sup> Declarations must be available for at least 80% of wood purchases by volume at initial audit. At subsequent audits the company is expected to maintain supplier declarations for 100% of wood purchases by volume, including for new suppliers.

<sup>6</sup> A sample RPP Supplier Declaration Form is attached in Appendix 3

- d) *Unknown* – Not linked to evidence sufficient to be classified as one of the *acceptable* sources in 2.2.1(a-c) above or whose *origin* cannot otherwise be confirmed.

### 3 Product List & *Claim* Accounting Systems

#### 3.1 Product List

3.1.1 The Company shall establish and maintain a list of products available for sale according to the following hierarchical *acceptable* source types:

- a) *FSC Certified*<sup>8</sup>
- b) RPP U.S. Renewing Forests
- c) Other RPP *acceptable* sources

3.1.2 Engineered Wood & Mixed Sources

- a) Engineered wood products that combine input materials from multiple sources shall be subject to the following restrictions:
  - i. To be classified as *RPP US Renewing Forests*, ALL wood components used in the engineered/mixed wood product shall meet the criteria and documentation requirements for *RPP US Renewing Forests* as listed above.
  - ii. If any wood component in a product is from an *unknown* source, no *RPP Label*, *Claim*, or *Chain of Custody* number can be directly associated with the product (including invoices and shipping document line items, brochures, website, etc.).

#### 3.2 Supplier Purchases

3.2.1 The Company shall establish, maintain, and keep up to date an accounting system for recording and tracking all wood purchased per supplier. The system must include at least the following information for each purchase:

- a) Product description
- b) Species
- c) Known *origin*

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<sup>8</sup> All FSC related claims for products that meet the FSC Chain of Custody standards for labeling are included in this category and are governed by FSC rules.

- i. Sufficient information to link accounting records to a declaration confirming the State, County or Landowner from where the wood was harvested within the United States of America, **OR**
  - ii. Sufficient information to link accounting records to a declaration confirming the Country, or region within a country, if the wood was harvested outside the United States of America
- d) Volume of wood purchased
  - e) Date of purchase and any other information specific to the shipment (e.g. purchase order number, supplier invoice number, shipping docket number or equivalent).
  - f) *RPP Source Type*

3.2.2 The Company shall maintain accurate records on purchased wood inputs in inventory according to *RPP Source Type*

### 3.3 Sales and Inventory of Products

3.3.1 The Company shall establish and maintain an up-to-date accounting system for recording and tracking all wood products manufactured and/or sold. The system shall identify products that are currently stored in inventory<sup>9</sup> AND products that have been sold. Minimum information shall include:

- a) Product description
- b) Volume of wood
- c) *RPP Source Type*
- d) Date of sale, if applicable

3.3.2 Annual summaries of the volumes of wood purchased and sold per *source type* shall be prepared prior to annual audits and provided to the *Certification Body*

## 4 Material Receiving, Storing & Processing

4.1 The Company shall clearly identify and keep all wood received from *unknown* sources separate from wood from *acceptable* source types.

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<sup>9</sup> Inventories at the time of the initial evaluation shall be classified by source type and shall be based on a sound justification. "RPP US Renewing" can be granted based on evidence that demonstrates the true origin of the material. Evidence can include species range, transportation costs and current declarations provided for like material from the same suppliers. Any inventory material without a corresponding declaration shall be classified as "unknown" inventory.

- 4.2 If there is any doubt as to the species or the *origin* of wood received, the Company shall employ the *precautionary approach* and classify the wood as an *unknown* source type.
- 4.3 The Company shall employ a tracking system for keeping *unknown* wood separate from wood from *acceptable* sources types throughout all production stages such that no wood from *unknown* sources will be used in products directly associated with RPP *claims and/or labels*.

## 5 Sales & Invoicing

- 5.1 Invoices for wood products from RPP *acceptable source* types, as identified by this Standard and the RPP Program Document, shall carry the following information:
- 5.1.1 The appropriate *chain of custody* code provided by an NWFA-approved *certification body* (e.g. SCS-RPP-XXXX), AND
- 5.1.2 The *claim* “RPP US Renewing Forests”
- 5.2 If the invoice does not accompany the shipment, the shipping document shall contain the information in 5.1.1 and 5.1.2 above.

## 6 Use of RPP *U.S. Renewing Forests* Label or Claim

- 6.1 The Company shall demonstrate that any use of the RPP *U.S. Renewing Forests* label or *claim* specifically relate to products that meet the requirements and definitions of this standard.<sup>11</sup>
- 6.2 The Company shall comply with the RPP Label Communication Use Rules and Restrictions found in the RPP Style Guide

## 7 Benchmarking, Objectives & Compliance with RPP Tiers

### 7.1 Benchmarking

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<sup>11</sup> Rules for using the RPP Labels are contained in Appendix 3 of the RPP Program Document and RPP Style Guide.

- 7.1.1 An initial *baseline* shall be determined for sales of wood products based on each *source type* prior to the Company's initial RPP CoC audit and shall be recalculated every 12 months thereafter.
- 7.1.2 *Baselines* for each *source type* shall be calculated as a percentage of the value of total wood sales.

## 7.2 Objectives

- 7.2.1 Each time the Company calculates a *baseline*, they shall share it with NWFA and cooperate with NWFA to set *objectives* for the next 12 months. Objectives shall be organized by *source type* and shall represent a percentage decrease in products whose source type is *unknown* until that percentage is zero.
- 7.2.2 Once FSC *Chain of Custody* certification is achieved, sales of *FSC certified* product shall increase as a percentage of total sales on an annual basis unless justified to NWFA<sup>13</sup>
- 7.2.3 Objectives shall be ambitious yet realistic and achievable, considering available supply, local market conditions, turnover, and other applicable factors

## 7.3 Compliance with RPP Tiers

- 7.3.1 Company shall enter Tier 1 of the RPP by completing an RPP audit within 12 months of applying with NWFA
- 7.3.2 Prior to its next RPP CoC audit, any Company that has products whose source type is *unknown* shall establish and document a strategy for eliminating those products or moving them into *acceptable* source types.
- 7.3.3 If a Company has the ability to advance from one Tier to the next, then it shall.
- 7.3.4 Before moving to Tier 2 of the RPP and in no more than 36 months from the Company's initial RPP CoC audit, the Company must:
  - a) Obtain *FSC Chain of Custody* certification.
  - b) Provide evidence that all products whose source type was *unknown* have been reclassified as Acceptable or eliminated.

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<sup>13</sup> Please see definition of *justifiable constraint* in Appendix 1.



## Appendix 1: Definition of Terms

*Acceptable Source:* is wood that has been determined to come from one of the following sources: FSC-Certified sources from any region; Domestic sources from U.S. States where hardwood growth exceeds mortality and removals; non-domestic sources that are where the wood is covered by an NWFA-approved forest legality due diligence system.

*Certification body:* An organization approved by NWFA to audit Companies to this standard (see RPP Program Document for a list of approved certification bodies).

*Chain of Custody (CoC):* The succession of ownership of wood products from the forest through each stage of manufacturing and distribution to the final consumer.

*CoC:* See Chain of Custody

*Corrective Action Request (CAR):* Advises of a non-conformance with a standard (such as the RPP Standard or the FSC Chain-of-Custody Standard) issued by an auditor to a company following an audit; generally, a CAR is issued with instructions and a deadline for its resolution. Failure to resolve CARs can result in the suspension of chain-of-custody certification (see above).

*Forest Legality Standard Operation Procedure (SOP):* A formal system of assessing and mitigating risk of purchasing wood that has been illegally harvested or traded designed for the effective exercising of due care as defined by the U.S. Lacey Act.

*FSC-accredited Certification Body:* An organization that has been authorized by the Forest Stewardship Council to conduct forest management and/or chain of custody audits to FSC standards. A complete listing of FSC-accredited certification bodies can be found at this website: [FSC-accredited certifiers](#)

*FSC Certified:* One of the Acceptable Source Types in the RPP. Wood derived from a well-managed forest, recycled and controlled sources as defined by the FSC. For the wood to be considered “certified” it must be by a supplier invoice with an “FSC 100%”, “FSC Mix %”, “FSC Mix Credit”, “FSC Recycled %”, or “FSC Recycled Credit” claim and supplied by a company holding a valid FSC chain of custody certificate.

*Justifiable constraint:* A limitation beyond the control of the company that is documented and accepted by NWFA and/or the certification body as a valid and reasonable explanation as to why they were unable to meet a requirement.

*Origin:* The country (or region) where the wood was originally harvested from the forest, which is not necessarily the country (or region) where the product was manufactured or traded.

*Other Acceptable Source:* One of the Acceptable Source Types in the RPP. It includes Post-consumer Recycled Wood, Pre-Consumer Recycled Wood, and Salvaged Wood (see below), as well as wood imported into the United States of America that is linked to a corresponding USDA APHIS Plant and Plant Product Declaration Form covering the shipment and covered by an NWFA-approved forest legality standard operating procedure (SOP),

*Post-consumer Recycled/Reclaimed Wood:* Wood or wood fiber that has been reclaimed from an end-user after being used for its intended purpose. End-users may include individuals, households or industrial users of the product.

*Pre-consumer Recycled/Reclaimed Wood:* Wood or wood fiber that is created as a by-product of a secondary manufacturing process and is not typically re-used on-site in the same process that generated it (also called *post-industrial recycled/reclaimed wood*).

*Precautionary approach:* Within the context of this standard the precautionary approach shall be defined as a high level of risk aversion by the Company; meaning that sources are to be considered *unknown* unless all evidence suggests they are *acceptable*.

*Primary supplier:* Any supplier of logs/roundwood or processor of logs/roundwood into primary products (e.g. veneer, rough lumber, chips and sawdust)

*RPP US Renewing Forests Claim:* Statement made on invoices or shipping documents for RPP compliant material. When 100% of the wood in a product is from a U.S. Renewing Forest a corresponding claim of “RPP Renewing Forests” shall be included in the line item.

*Salvaged Wood:* Wood or wood fiber that comes from logs that have been salvaged from the following sources: post-agricultural (e.g. fruit and nut orchards); urban forests (street trees); waterways (sunken logs raised from rivers, reservoirs, and lake bottoms); and other sources reviewed and approved as salvaged by NWFA and the certification body.

*Source Type:* Refers to the classes of *acceptable* and *unknown* sources used throughout the RPP. The Source Types are as follows:

1. Unknown
2. Acceptable
  - 2.1. FSC Certified
  - 2.2. RPP US Renewing Forests
  - 2.3. Other Acceptable

*Unknown Source:* Any wood that is not linked to evidence sufficient to be classified as one of the *acceptable* sources or whose *origin* cannot otherwise be confirmed.

*RPP US Renewing Forests:* One of the Acceptable Source Types in the Responsible Procurement Program. A designation given to hardwood forests based on five-year, statewide statistics from the USDA Forest Inventory and Analysis whereby hardwood growth is equal to or greater than

removals and mortality measured in volume. US Renewing Forest can be considered functionally equivalent to “sustainable yield” at the US State-level; however, it is not meant to suggest or imply sustainable forest management.

## Appendix 2 – Example of a Procurement Policy

**Please include a Procurement Policy like the one below on Company letterhead, signed by a senior executive and posted publicly, e.g. Company website.**

### **Company's Responsible Wood Procurement Policy**

It is the policy of Company to procure and sell wood and wood products originating from responsible sources. To that end, Company commits to increasing our wood purchases from responsible known sources and to avoiding wood from controversial sources. Company has appointed Mr/Ms Smith as the contact person responsible for implementing this policy.

The following are considered responsible sources within the context of this policy and in conformance with Tier 1 of the Responsible Procurement Program:

- FSC-Certified Wood
- U.S. Renewing Forests – the forest of origin is located in a U.S. State where the volume of hardwood growth meets or exceeds mortality and removals
- Other acceptable sources:
  - Pre and post-consumer recycled, reclaimed or salvaged wood
  - Imported wood covered by an NWFA-approved forest legality Standard Operating Procedure (SOP),

Company is committed to making best efforts to identify the sources of wood used in the manufacture and sale of our products but recognizes the difficulty in achieving 100% certainty. For this reason Company invites stakeholders to contact us by Describe how and who to address formal complaints to and issue a formal complaint if it is believed that we are not meeting this policy. Company makes the following commitments towards efficient processing and responses to all valid complaints; Company shall:

- ✓ Evaluate and respond to complaints within 2 weeks;
- ✓ Investigate all complaints within 2 months;
- ✓ Immediately halt the use of wood found not to be in line with the Company's procurement policy;
- ✓ Maintain records for all complaints and actions taken to be made available to a third party auditing organization.

Signature of Senior Executive    Date

Name and Title

**[RPP Certified Company]**

**Domestic Supplier Declaration - NWFA Responsible Procurement Program**

In signing this declaration, I attest to the following:

*PART ONE of THREE: Company Specification*

We supply **[RPP Certified Company]** with hardwood lumber, veneer, and/or logs of the species listed in the table below

- We are the original log buyers of the material supplied (we purchased the material from forest of origin) OR
- We are not the original log buyers of the material supplied (we purchased the material from a log yard, a mill, a broker, or any source other than the forest of origin), but we are able to accurately and truthfully complete this declaration because:

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*PART TWO of THREE: Declaration of Origin*

- ✓ All of the logs we procure originate in one or more of the U.S. regions declared in the table below:
- ✓ The maximum economically feasible hauling radius for hardwood logs received by our company (or our suppliers) is \_\_\_\_\_ miles. A log would only be hauled the maximum distance if it were a high-quality specimen of a high-value species such as \_\_\_\_\_. All other species of lower economic value, such as \_\_\_\_\_, are generally hauled a lesser distance – typically \_\_\_\_\_ miles or less.

**Species and Origin of Hardwood Material Supplied**

| Species | U.S. State | County(ies) (if available) |
|---------|------------|----------------------------|
|         |            |                            |
|         |            |                            |
|         |            |                            |
|         |            |                            |
|         |            |                            |
|         |            |                            |

*PART THREE of THREE: Supplier Affirmation*

\_\_\_\_\_  
Supplying company name

\_\_\_\_\_  
Mailing address / Physical address (if different from mailing address)

\_\_\_\_\_  
City and state

I certify that I am an owner/officer of the Company and the information furnished herein is true and correct:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Type or Print Name

\_\_\_\_\_  
Date

*The information provided in this declaration must be confirmed annually and a new declaration produced if anything changes. After 5 years from the initial declaration, a new declaration must be executed.*

| <b><u>Date of Confirmation</u></b> | <b><u>Name of Person Obtaining Confirmation</u></b> |
|------------------------------------|-----------------------------------------------------|
|                                    |                                                     |
|                                    |                                                     |
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