



PACIFIC LUMBER INSPECTION BUREAU

Responsible Source ASTM D7612-10

Public Audit Report

DECEMBER 2, 2019

COMPANY	Roseburg Forest Products 3660 Gateway Street, Springfield, OR 97477
MILL LOCATION	Dillard, OR
PRODUCTS	Lumber
CO. REPRESENTATIVE	Hayley Morris 541.658.6131 ext. 56131 hayleym@rfpco.com
AUDIT DATE	August 15, 2019
AUDIT REPORT	November 12, 2019
AUDIT SCOPE	Annual Surveillance Audit
PLIB AUDIT TEAM	Glen Walton, Hannah Petersen

Conducted in accordance with the Oregon Department of Forestry 'Traceability Requirements for Responsible Sources' standard and ASTM Standard D7612-10 'Standard Practice for Categorizing Wood and Wood-Based Products According to Their Fiber Sources.'



AUDIT OBJECTIVES

The objective of the annual audit of Roseburg Forest Products lumber operation at Dillard OR is to verify the chain of custody system in accordance with the Oregon Department of Forestry ‘Traceability Requirements for Categorizing Wood and Wood Based Products According to Their Fiber Sources’.

The audit emphasis is to protect against illegal sourcing and to ensure that the Responsible Source claim and Chain of Custody procedures are accurate and effective, respectively.

AUDIT FINDINGS: OBSERVATIONS, INTERVIEWS, DOCUMENTATION

Document review:

The Roseburg Responsibly Sourced ASTM D7612 Management System for Chain of Custody System Document was reviewed with Roseburg staff. Ms. Morris noted there were no material changes to the document. Management Staff had been updated to current information and were noted. It was also noted that Roseburg has not begun labeling their invoices with any claims as of the date of the audit. A copy of the revised document was provided to PLIB.

A random sampling of Purchase Orders with corresponding scale or log tickets were reviewed. In every case, when logs were identified as responsibly sourced, there was a corresponding FERNS number and the Chain of Custody was verified. In the random sampling, one ticket was pulled without a FERNS number, and it was demonstrated to be excluded from the percentage calculation of Responsible Source.

The spreadsheet calculating the percentage of responsibly sourced was reviewed. It was noted how a database had been developed to track the percentage of Responsible Source logs and other logs. The data supported the claim of “...>80% Responsibly Sourced” and, in fact, often was much higher, approaching 95% on average.

The internal audit conducted by Roseburg staff was reviewed and it was noted that most items were in compliance. One observation was that there was a small amount of logs received without a FERNS or notification number. The suppliers are being identified and requirements are being put in place to ensure that notification numbers are being provided. It was noted that it is possible to look up notification number for these harvests when necessary, but instead these amounts were excluded from the calculation and Roseburg still met the claim of 80% Responsible Source with plenty of margin. A copy of the internal audit was provided for PLIB files.

INTERVIEWS

Primary interview and review of document was done with Hayley Morris, compliance and sustainability analyst. Interviews were also conducted with personnel involved with log receiving and processing of resource data, including Jenny L. in Accounts Payable who kept the files showing the log tickets and corresponding notification numbers, Aaron P. who demonstrated the connection between the database and the spreadsheet calculating the percentages for each quarter, and Derrick H. in the log shed who discussed the procedures followed regarding log tickets.

NON-CONFORMITIES AND OPPORTUNITIES FOR IMPROVEMENT

No major or minor non-conformances were noted on this audit.

Observation for improvement:

It was noted that while Roseburg is requiring a FERNS number or certification number on every purchase of logs in Oregon, that number still does not always appear on every purchase order and that purchase is excluded from the Responsible Source claim. While internal enforcement has improved, Roseburg is considering additional policies to ensure that suppliers also comply with the request and provide the certification numbers as requested to achieve a higher percentage claim in the future.

SUMMARY OF AUDIT RESULTS

Roseburg demonstrated significant experience and knowledge of chain of custody systems and audit expectations. There was successful demonstration during the audit that the Roseburg Responsible Source management system meets the criteria for making a claim of “Responsible Source” in accordance with the Oregon Department of Forestry ‘Traceability Requirements for Responsible Sources’ standard and ASTM Standard D7612-10 ‘Standard Practice for Categorizing Wood and Wood-Based Products According to Their Fiber Sources’, and the PLIB Audit Policy and Procedures for Responsible Sourcing.

Roseburg has an effective Responsible Sourcing Chain of Custody management system as determined from interviews, review of documentation and on-site observations by PLIB personnel. The management system has been found to be in substantial conformance and has fulfilled the audit objectives. A claim of 100% Legal Sources, 80% Responsible Sources is supported by the evidence reviewed. The claimed percentages may change over time depending on the resource, but the 80% Responsible Source claim continues to be maintained.

PLIB staff can say with reasonable confidence that based on the evidence presented and the interviews conducted, the risk of illegal sourcing is minimal.

The Audit results support the claim of “PLIB-RS-0001 Responsibly Sourced - ASTM D7612 - 80% Responsible and Legal Sources, 100% Legal Sources, Applicable to Lumber products.”