



PACIFIC LUMBER INSPECTION BUREAU

RESPONSIBLE SOURCED – ASTM D7612-10

PUBLIC AUDIT REPORT

Company	Roseburg Forest Products (PLIB-RS-0001) 3660 Gateway Street, Springfield, OR 97477
Mill Location	Dillard, OR
Products	Lumber
Company Representative	Hayley Morris 541.658.6131 ext. 56131 HayleyM@rfpco.com
Audit Date	September 30, 2020
Report Date	December 10, 2020
Audit Scope	Annual Surveillance Audit
PLIB Audit Team	PLIB: Glen Walton, Ben Haynes

¹ 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'.



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Audit Objectives

The objective of the annual Responsibly Sourced Audit of Roseburg Forest Products lumber operation in 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.*

Document review

The Roseburg Responsibly Sourced ASTM D7612 Management System for Chain of Custody System Document was reviewed with Roseburg staff. Ms. Morris noted that the document was updated in July 2020 and there had not been any changes to the management team. It was also noted that Roseburg has not begun labeling their invoices with any claims as of the date of this audit. A copy of the revised document was provided to PLIB.

A random sampling of three log purchase agreements with corresponding scale tickets were reviewed. These documents were pulled for the months of February, May, and July 2020. In every case, when logs were identified as responsibly sourced, there was a corresponding FERNs number, and the Chain of Custody was verified. The FERNs notification numbers listed on the purchase agreements were verified on the Oregon Department of Forestry (ODF), Forest Activity Electronic Reporting and Notification System (FERNs) website <https://ferns.odf.oregon.gov/E-Notification/#notify>.

Ms. Morris provided a current copy of the spreadsheet that Roseburg uses for calculating the percentage of responsibly sourced production. It was noted how a database had been developed to track the percentage of Responsible Source logs and logs from other sources (federal, out-of-state, etc.). The data supported the claim of "...>80% Responsibly Sourced" and, in fact was 90% or greater the majority of the time.

The internal audit conducted by Roseburg staff in August 2020 was reviewed and it was noted that most items were complying. One observation was that there was a small number of logs received between June 2019 and July 2020 without a FERNs notification number. The suppliers are being identified as tribal landowners and suppliers who self-report. The tribal landowners are not subject to the Oregon Forest Products Act (OFPA) and are not required to report a notification number. As a result, the tribal forest lands are not classified as Responsibly Sourced. The self-reporting suppliers do have the ability to report a notification number and are eligible for certification as Responsibly Sourced. Roseburg is looking into ways of categorizing volumes from tribal lands separately, so it is clear why notification numbers are not available. All potential notification numbers will be requested each year for the self-reporting suppliers. These notification numbers will be kept on file by Roseburg. Even with these observations Roseburg still met the claim of 80% Responsibly Sourced with plenty of margin. A copy of the internal audit was provided for PLIB files.

Interviews



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Primary interview and review of documentation was done with Hayley Morris, Sustainability Specialist. Interviews were also conducted with personnel involved with log receiving and processing of resource data, including Jennafer Mealer, Resource Specialist who provided copies of the log purchase agreements and scale tickets. Derrick Hannelbeck in the log shed discussed the procedures followed when log trucks arrive as well as the processing of scale 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 agreement and that purchase is excluded from the Responsible Source claim. Roseburg is considering additional policies to ensure that all suppliers subject to the OFPA provide the certification numbers as requested.

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 Roseburg meets the criteria for making a claim of “Responsible Sourced” in accordance with the ODF ‘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 of 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% Responsibly Sourced 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.”