

FSC-US Controlled Wood National Risk Assessment
for the conterminous USA (US-NRA) v.1-0

USER'S GUIDE

Summary, Discussion, & Commentary for Practitioners

December 2019

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Background and Context:

The rollout, over the last 6 years (more or less), of FSC's latest version of the Controlled Wood standard, has introduced the community to the conceptual structure of **Due Diligence Systems (DDS)**. In common with other, international DDS standards (e.g. PEFC) the latest FSC Controlled Wood standard specifies a 3-step evaluation process:

- 1) Information Gathering
- 2) Risk Assessment
- 3) Risk Mitigation

In theory, Due Diligence can be carried out at any scale. In practice, however, there are enormous advantages to conducting it at the largest scale practical. The FSC National Risk Assessment process is intended to provide much of the necessary "work" for Due Diligence for (in this case) the whole of the continental United States (excluding Alaska & Hawaii).

It is important to remember that FSC's Controlled Wood program has – since its inception in 2004 – focused on **"Five Categories of Unacceptable Wood"**:

- 1) Illegally harvested wood
- 2) Wood harvested in violation of traditional and human rights
- 3) Wood from forests in which high conservation values are threatened by management activities
- 4) Wood from forests being converted to plantations or non-forest use
- 5) Wood from forests in which genetically modified trees are planted

These five categories form the basis of the US NRA – including its scope, conclusions, and probable consequence.

Authors, Experts, and Contributors:

FSC-US staff began work on this document in 2012, assembling a Working Group from the membership, and assigning considerable staff attention in 2013-2014. A discussion draft, released in early 2015, was not well received and became obsolete rather quickly as FSC proceeded to update the main Controlled Wood standard (v. 3.0/1, initially published in late 2015).

More recent work on this final version was supported by the FSC-US Policy and Standards Committee (PSC) and a smaller, 3-member Technical Advisory Group (TAG). The approved US-NRA v.1-0 is largely the work of FSC-US staff and this advisory group – with input and feedback from the PSC, a short list of



subject-area experts, several interested members of the FSC-US Board of Directors (BoD), and limited open feedback during the final consultation process.

Names and affiliations of the people involved are found in the “Background Information” section of the US-NRA, on page 4. **It is important to appreciate that this NRA Discussion draft represents the work of a very small group of people (less than 30), of whom only about five came from implementing CW companies.**

Maintenance and Updates:

On page 11, the NRA is described as a “living document” that will be “updated to incorporate new information as it becomes available”. Reference is made – however – to the FSC rules for NRA development found in STD-60-002. Here we find that “updates” should be limited in scope and involve no change in risk determination and the means of risk mitigation.

Structure and Organization of the Document:

The US-NRA is a rather extensive (299 page), detailed, and somewhat duplicative document. It is structured primarily around the 5 FSC CW Categories, as well as the 3-step DDS format; as summarized in this table:

	Information	Risk Assessment	Mitigation
Category 1: Legality	extensive lists of information citations and references to expert consultation	summary of information, discussion of consequence, and risk conclusions	none specified
Category 2: Civil Rights			none specified
Category 3: HCVs			mandatory
Category 4: Conversion			“Control Measures”
Category 5: GMOs			none specified

About half of the document (pages 13-180) is presented in a tabular format specified by FSC-International (FSC-IC). This is to align with other Risk Assessments being produced elsewhere in the world. Much of the assessment information is additionally presented in a series of Annexes. These somewhat overlap the information in the Risk Assessment tables and present some of the discussion and conclusions in a more visually digestible manner.

In particular,

- Annex A provides a Glossary of important terms;
- Annex B is a map of FSC-US geographic regions;



- Annex C presents a helpful table showing key Risk Designations by region:

	Category 1: Legality	Category 2: Traditional & Human Rights	Category 3: High Conservation Values						Category 4: Conversion	Category 5: Genetically Modified Organisms
			HCV 1: Species Diversity	HCV 2: Landscape- Level Forests	HCV 3: Rare Ecosystems	HCV 4: Critical Ecosystem Services	HCV 5: Community Needs	HCV 6: Cultural Values		
FSC US Region										
Pacific Coast	Low	Low	Specified ¹	Low	Specified ⁴	Low	Low	Low	Specified ⁹	Low
Rocky Mountains	Low	Low	Low	Low	Specified ⁵	Low	Low	Low	Low	Low
Southwest	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low
Non-Forested	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low
Great Lakes	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low
Northeast	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low
Appalachian	Low	Low	Specified ²	Low	Specified ⁶	Low	Low	Low	Low	Low
Ozark-Ouachita	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low
Mississippi Alluvial	Low	Low	Low	Low	Specified ⁷	Low	Low	Low	Low	Low
Southeast	Low	Low	Specified ³	Low	Specified ⁸	Low	Low	Low	Specified ¹⁰	Low

- Annex D (page 185-208) provides details for Category 2 analysis;
- Annex E & F (page 209-288) provides detail for HCV analysis;
- Annex G (page 289-299) the details for Category 4;



The User's Guide

Because the US-NRA draft is so long and detailed – and because it is so important - MixedWood presents the following summary to help busy practitioners digest, respond, and participate in the process.

Our User's Guide presents the contents of the US NRA this way:

- A) One CW Category at a time – from **Category 1 – 5**.
- B) Addressing Three Subjects:
 - 1) **What We Found** – briefly describes the content, discussion, and conclusions of the NRA for each category.
 - 2) **What We Think** – provides some informed commentary about the NRA. What we like. What we dislike. What is clear. What is unclear.
 - 3) **What You Should Do** – our specific recommendations for certified companies. Questions to consider. Ideas we hope you like. Feedback that FSC needs from you.

Category 1: Illegally Harvested Wood

- NRA – Tabular Format: page 13-70

What We Found	What We Think
<p>The Category 1 analysis is largely (perhaps entirely) the work of FSC-IC through their Central National Risk Assessment (CNRA) process.</p> <p>Extensive in scope, with separate sources, discussion, and conclusions for 21 individual legality topics:</p> <ul style="list-style-type: none"> 1.1 Land Tenure 1.2 Concession Licensing 1.3 Planning 1.4 Permits 1.5 Royalties & Fees 1.6 VA Taxes 1.7 Income Taxes 1.8 Harvest Regulations 1.9 Protected Sites/Spp. 1.10 Env. Requirements 1.11 Health & Safety 1.12 Employment 1.13 Customary Rights 1.14 FPIC 1.15 Indig. People's Rights 1.16 Classification 1.17 Trade & Transport 1.18 Offshore Trading 1.19 Custom Regulations 	<p>In spite of the scope and detail, we find this category analysis to be rather inconsequential. Assessing a subject as broad as legal compliance, for a country as diverse and complex as the USA, is a slightly absurd idea. And the results bear this out.</p> <p>Summary of the Conclusions: The USA is a modern, western society with comparatively high standards of transparency, accountability, and responsible governance. The risks of illegal conduct, associated with the sourcing, trading, processing, and sale of forest products are probably not systematic, and are certainly beyond the practical scope of mitigation by FSC.</p>



1.20 CITES 1.21 DDS Legislation Conclusion (all sub-cat. & regions): LOW RISK	
What You Should Do: <ul style="list-style-type: none"> • Mostly nothing. • Be satisfied that FSC has provided a sufficient, written record which verifies that no further action is necessary to source forest products from across the USA with a LOW RISK for this category. • We do NOT recommend using this analysis for other purposes (consult your lawyer). 	

Category 2: Wood Harvested in Violation of Trad'l & Human Rights

- NRA – Tabular Format: page 71-95
- Annex D: page 185-208

What We Found	What We Think
<p>The Category 2 analysis represents both the work of FSC-IC & FSC-US. Considerable inputs are from legally-trained experts.</p> <p>Extensive & detailed in scope, with separate sources, discussion, and conclusions for 3 specific topics:</p> <ul style="list-style-type: none"> 2.1 Violent Armed Conflict 2.2 ILO Principals 2.3 Rights of Indig. & Trad'l Peoples <p>Discussion and analysis address, additionally, 10 specific risk thresholds that are identified in the standard guidance. 9 pages of reference citations are included.</p> <p>NOTE: Text in Annex D supports (& to some extent duplicates) the discussion & conclusions found in the NRA table.</p> <p>Conclusion (all sub-cat. & regions): LOW RISK</p>	<p>FSC's treatment of this challenging set of topics shows the signs of competent and careful expertise. The unique and complex nature of US politics and its relationship to international norms (e.g. ILO) required this expertise, and the resulting analysis is both focused and rigorous.</p> <p>Summary of the Conclusions: The USA is a modern, western society with strong traditions, and legal safeguards, for protecting the civil rights of individuals and groups. The risks of encountering significant violations of Traditional & Human Rights, associated with the sourcing, trading, processing, and sale of forest products are probably not systematic and are certainly beyond the practical scope of mitigation by FSC.</p>
What You Should Do: <ul style="list-style-type: none"> • Definitely nothing. • Be satisfied that FSC has provided a sufficient, written record which verifies that no further action is necessary to source forest products from across the USA with a LOW RISK for this category. 	



Category 3: Wood from Forests in which High Conservation Values (HCV) are Threatened by Management Activities

- NRA – Tabular Format: page 97-167
- Annex G: page 289-299

What We Found	What We Think																																																																																											
<p>The Category 3 analysis appears to be the work of FSC-US with support from their Working Group. It represents, by far, the most challenging part of the NRA project.</p> <p>The discussion and analysis for this category are quite complex and extensive.</p> <p>An introductory “overview” attempts to provide context by describing the broad forested regions of the US as well as a short (& rather odd) summary of basic silvicultural systems. There is a list of 22 experts that overlaps considerably with the list provided for the whole NRA. Nine pages of source citations are provided.</p> <p>Specific analysis of High Conservation Values (HVC) is organized into 6 sub-categories, which are described, assessed, and discussed individually. Conclusions are presented by sub-category and region – summarized in this table:</p> <table><tr><th colspan="7">Category 3: High Conservation Values</th></tr><tr><th></th><th>HCV 1: Species Diversity</th><th>HCV 2: Landscape-Level Forests</th><th>HCV 3: Rare Ecosystems</th><th>HCV 4: Critical Ecosystem Services</th><th>HCV 5: Community Needs</th><th>HCV 6: Cultural Values</th></tr><tr><td>FSC US Region</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Pacific Coast</td><td>Specified¹</td><td>Low</td><td>Specified²</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Rocky Mountains</td><td>Low</td><td>Low</td><td>Specified³</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Southwest</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Non-Forested</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Great Lakes</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Northeast</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Appalachian</td><td>Specified⁴</td><td>Low</td><td>Specified⁵</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Ozark-Ouachita</td><td>Specified⁶</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Mississippi Alluvial</td><td>Specified⁷</td><td>Low</td><td>Specified⁸</td><td>Low</td><td>Low</td><td>Low</td></tr><tr><td>Southeast</td><td>Specified⁹</td><td>Low</td><td>Specified¹⁰</td><td>Low</td><td>Low</td><td>Low</td></tr></table> <p>Four of the six HCV sub-categories are analyzed and presented with a low-risk conclusion, including:</p> <ul style="list-style-type: none">HCV 2: Landscape-Level ForestsHCV 4: Critical Ecosystem ServicesHCV 5: Community NeedsHCV 6: Cultural Values	Category 3: High Conservation Values								HCV 1: Species Diversity	HCV 2: Landscape-Level Forests	HCV 3: Rare Ecosystems	HCV 4: Critical Ecosystem Services	HCV 5: Community Needs	HCV 6: Cultural Values	FSC US Region							Pacific Coast	Specified ¹	Low	Specified ²	Low	Low	Low	Rocky Mountains	Low	Low	Specified ³	Low	Low	Low	Southwest	Low	Low	Low	Low	Low	Low	Non-Forested	Low	Low	Low	Low	Low	Low	Great Lakes	Low	Low	Low	Low	Low	Low	Northeast	Low	Low	Low	Low	Low	Low	Appalachian	Specified ⁴	Low	Specified ⁵	Low	Low	Low	Ozark-Ouachita	Specified ⁶	Low	Low	Low	Low	Low	Mississippi Alluvial	Specified ⁷	Low	Specified ⁸	Low	Low	Low	Southeast	Specified ⁹	Low	Specified ¹⁰	Low	Low	Low	<p>The FSC analysis for this category is wide-ranging and generally comprehensive. Conclusions vary considerably and should be considered individually.</p> <p>The HCV analysis provided by FSC-US is quite comprehensive and well-sourced. Discussion is conducted at a variety of scales, as are the conclusions. The resulting findings also vary considerably in scope and consequence.</p> <p>Analysis for HCV 1 (Species Diversity) is organized initially around a Nature Conservancy (TNC) dataset which identifies a series of “Critical Biodiversity Areas” (CBA); and secondarily the identified ranges of a short list of Rare, Threatened, or Endangered (RTE) Species. Much of the risk identified appears focused around wetland and riparian habitats (& related species diversity) and may be mitigated best by the implementation of Best Management Practices (BMP) for water quality.</p> <p>The HCV 3 discussion is somewhat less focused. A variety of landscape-wide designations – described variously by government agencies and conservation NGOs are examined and discussed. Criteria for risk designations appear somewhat arbitrary and/or subjective. Helpfully, the geographic extent of these areas of concern tends to overlap with areas identified in HCV 1 analysis.</p> <p>We are particularly puzzled at the decision to designate as “specified risk” the areas of publicly-owned Old Growth forest in the Pacific Coast and Rocky Mt regions. The decision to limit this designation to publicly managed land appears to be</p>
Category 3: High Conservation Values																																																																																												
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<p>These sub-categories will not require further attention or effort by most companies (see below).</p> <p>The remaining two HCV sub-categories are discussed and analyzed with a conclusion of “specified” risk in two general categories:</p> <ul style="list-style-type: none"> ▪ Endangered spp. & habitats (HCV 1) ▪ Rare Ecosystems (HCV 3) <p>Broadly speaking, the habitats of concern include western old growth forests; coves and bottoms in the SE & Appalachia; and longleaf pine ecosystems. The species of concern are from a short list, including 7 amphibians and 1 bird.</p> <p>Conclusion varies by region:</p> <p>SPECIFIED RISK:</p> <ul style="list-style-type: none"> ▪ Pacific Coast ▪ Rocky Mts ▪ Southeast ▪ Appalachian ▪ Ozark-Ouachita ▪ Mississippi Valley <p>LOW RISK:</p> <ul style="list-style-type: none"> ▪ All other regions <p>Standard “Control Measures” for Mitigation</p>	<p>a political decision that is inappropriate in an analysis like this one.</p> <p>Summary of the Conclusions: After considerable analysis, FSC has identified the following High Conservation Values which may be threatened by forest management activities:</p> <ul style="list-style-type: none"> ▪ Publicly managed old growth forests in the Pacific & Rocky Mt. regions ▪ Rich Cove stands in Appalachia ▪ Hardwood bottoms and longleaf pine in the SE, Mississippi Valley, & Ozarks ▪ A number of RTE species in the same regions. <p>The risk of sourcing wood from forests may be threatening these HCVs, in these regions, and must be mitigated by,</p> <ul style="list-style-type: none"> ▪ Implementation of one or more “Control Measures”, collaboratively discovered by regional dialogues facilitated by FSC-US.
<p>What You Should Do:</p> <ul style="list-style-type: none"> • Consider the consequence of HCV 1 risk findings related to Longleaf Pine restoration objectives in the Southeastern pine belt. Do you find this reasonable, appropriate, and practical? Are the opportunities for practical mitigation realistic? Please provide comments to FSC-US. • Consider the consequence of HCV 1 & 3 risk findings related to rich hardwood stands in the Appalachian and Mississippi Valley regions. Is there a practical prospect of meaningful and measurable mitigation of impacts to these sites? Do you have suggestions or comments? If so, FSC-US needs to hear from you. • Consider the consequence of the FSC finding for publicly-managed Old Growth forests in the west. Do you agree that FSC-certified procurement foresters might provide effective mitigation of manage decisions by federal agencies? Do you have other comments or suggestions on this topic? If so, please provide them to FSC-US. 	



Category 4: Wood Harvested from Forests Being Converted

- NRA – Tabular Format: page 168-176
- Annex G: page 289-299

What We Found	What We Think
<p>The Category 4 analysis appears to be the work of FSC-US with support from their Working Group.</p> <p>The discussion includes a brief, but inconsequential reference to the (mostly nonexistent) legal framework related to conversion.</p> <p>An attempt to conduct quantitative analysis at the national level, citing 2 federal data sources (FIA & NLCD), is provided; but no conclusion is offered.</p> <p>A qualitative analysis is offered that cites a wide variety of sources, and offers an independent, unique, and regionally-specific set of conclusions.</p> <p>NOTE: Text in Annex G supports (& to some extent duplicates) the discussion & conclusions found in the NRA table.</p> <p>Conclusions vary by region:</p> <p>SPECIFIED RISK:</p> <ul style="list-style-type: none"> ▪ Pacific Coast ▪ Southeast ▪ Mississippi Valley <p>LOW RISK:</p> <ul style="list-style-type: none"> ▪ All other regions <p>Standard “Control Measures” for Mitigation</p>	<p>FSC correctly concludes that existing quantitative data about forest conversion in the US is inconclusive. The subsequent qualitative analysis cites a reasonable variety of credible sources but arrives at a conclusion that is somewhat puzzling. The key finding - that conversion of forestland is mostly related to urbanization - is reasonable. But the analysis fails to provide any causal linkage to commercial wood procurement or forest harvesting. This fact tends to undermine the conclusion of “specified” risk and the requirement for mitigation.</p> <p>Summary of the Conclusions: Available information concerning conversion of forests to plantations and/or non-forest use suggests that principle risks are associated with urbanization and concentrated in the West and Southeast. The risk of sourcing wood from converted forests in these regions must be mitigated by,</p> <ul style="list-style-type: none"> ▪ Implementation of one or more “Control Measures”, collaboratively discovered by regional dialogues facilitated by FSC-US.
<p>What You Should Do:</p> <ul style="list-style-type: none"> • Consider whether you agree or disagree with the FSC-US conclusion for this Category. Do you agree that forest conversion in urban areas of the West & SE is unlikely to be influenced by activities of CW companies? If so, consider what next steps the community may face when we collectively “fail” to mitigate this risk. • Consider how practical mitigation of forest conversion in the West & SE might be undertaken. Is avoidance or refusal of conversion-sourced wood practical or sensible? Do 	



you have other practical comments or suggestions on this topic? If so, please provide them to FSC-US.

- Consider what activities the forest products industry might already be taking that may have positive influences on the rates of forest conversion. Should we support and encourage existing programs like American Tree Farm, Project Learning Tree, etc. rather than organize a new network? If so, please provide FSC-US with your ideas about how.

Category 5: Wood Harvested from Forests with GMO Trees

- NRA – Tabular Format: page 177-180

What We Found	What We Think
<p>The Category 5 analysis is largely (perhaps entirely) the work of FSC-IC through their Central National Risk Assessment (CNRA) process.</p> <p>Simple, focused scope, with separate discussion, and conclusions for 9 “context questions” provided by FSC guidance (pg. 137).</p> <p>Conclusion (all sub-cat. & regions): LOW RISK</p>	<p>FSC treats this simple indicator in a straightforward manner. Because there is, as yet, no commercial deployment of GMO technology in the US forest products industry, the subject remains essentially mute.</p> <p>Summary of the Conclusions: There is, as yet, no commercial deployment of GMO technology in the US forest products industry. The risks of sourcing trees from forests where GMO trees are planted is essentially negligible. Future deployment of these techniques may require re-assessment.</p>
<p>What You Should Do:</p> <ul style="list-style-type: none"> • Definitely nothing. • Be satisfied that FSC has provided a sufficient, written record which verifies that no further action is necessary to source forest products from across the USA with a LOW RISK for this category. 	

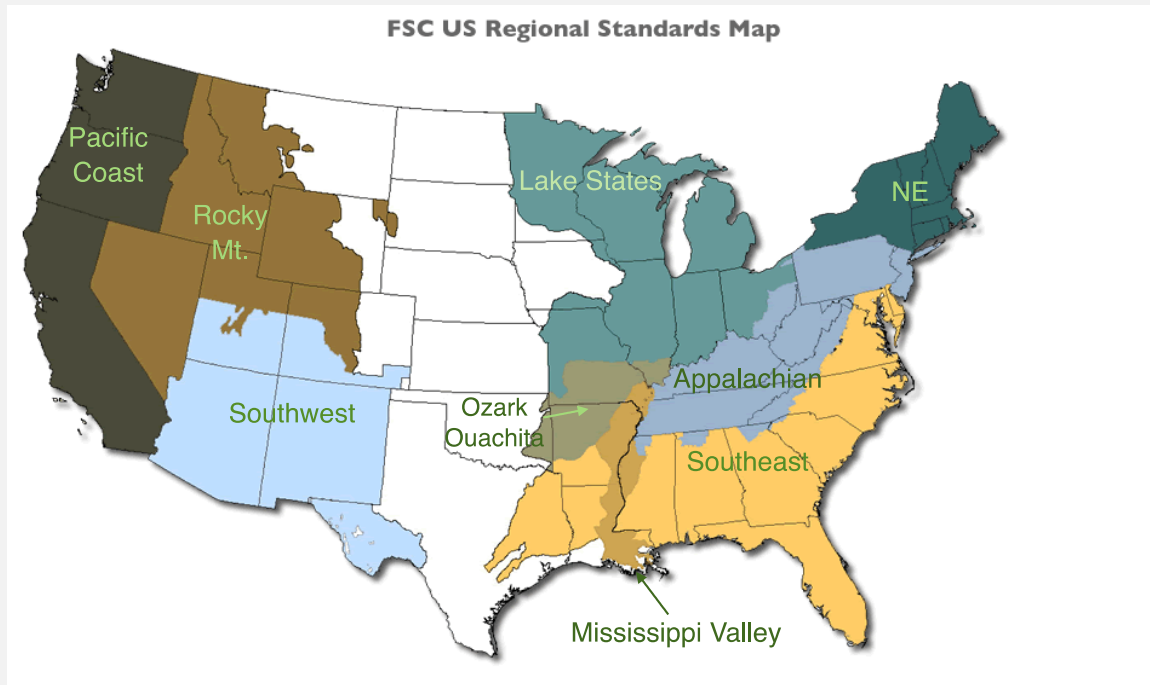


“Control Measures” – Where, What, How?

WHERE?

1) Control Measures (CM) apply only if **sourcing wood from the following areas:**

FSC Region	Category 3 (HCV)	Category 4 (Conversion)
Pacific Coast	yes	yes
Rocky Mts.	yes	no
Southwest	no	no
Great Lakes	no	no
Northeast (NE)	no	no
Appalachian	yes	yes
Ozark-Ouachita	yes	no
Mississippi Alluvial	yes	yes
Southeast	yes	yes

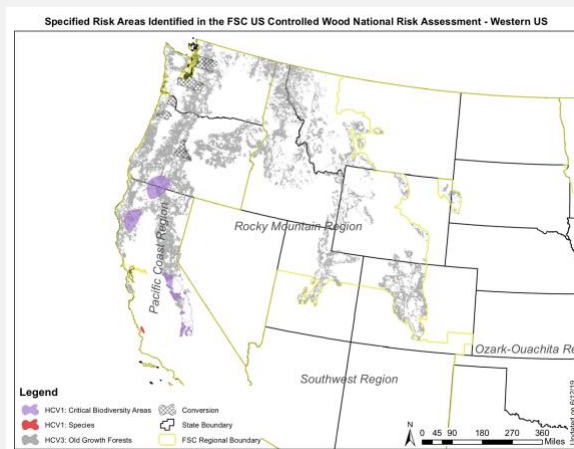
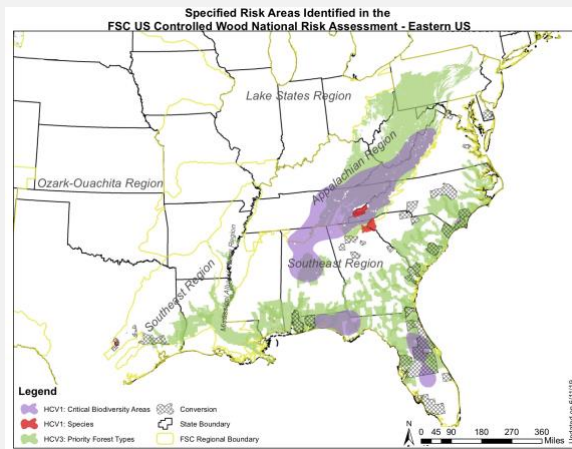


WHAT?

- 1) Attend **Regional Meetings** (*CM 3.a.i & CM 4.a.i*)
-> or **review meeting reports** (*CM 3.a.ii & CM 4.a.ii*)
 - a. Meeting Elements:
 - i. Collaborative Dialogues
 1. Identification of “focused set of actions” (see 2. below)
 - ii. Information Sharing
- 2) **Implement Actions** (*CM 3.1.b & CM 4.1.b*)
 - a. From “Collaborative Dialogues” (1.a.i.1 above)
 - b. Commensurate with scale and intensity of the organization
- 3) **Provide Input**
 - a. To assessment process defined by FSC-US

HOW?

- 1) Locate your procurement area. Compare with FSC Regions and Specified Risk areas:



2) Pick your “Control Measures”

				ACTIONS													
REGION				ALL IMPACT LEVELS				HIGH IMPACT ORG'S				PRIMARY PROCUREMENT					
	SPEC. RISK	GEOGRAPHIC SCOPE	TOPIC	Communication Materials	Engage -> Promote	Engage & Support	Engage & Support -> Use	Engage & Support -> Use	Develop Strategy	Develop/Join Alliance -> Use	Establish/Impl. Program	Procurement Policy	Training	Engage -> Contract	Provide Incentive	Contract/Impl. BMPs	
Appalachian	Central Appal. CBA	region-wide	Educ. & Outreach	X				X									
			Research & Mapping			X											
			Conserv. Initiatives									X					
			BMP Enforcement														
	Mesophytic Cove Sites	region-wide	Direct Influence												X		
			Educ. & Outreach	X													
			Research				X				X						
			Mapping											X			
	Cheoah Bald Salamander	narrow (NC)	Staff Training														
			Educ. & Outreach	X								X					
Research						X											
Conserva. Planning					X												
SE, Appalachian, Ozark, Mississippi	Late Succ. Bottom HWs	region-wide	Conserv. Initiatives			X											
			Direct Influence														
			Educ. & Outreach	X									X				
			Impl. Mgmt. Activities			X											
	Sthn. Appal. CBA	large (TN, AL, GA)	Research & Mapping					X									
			Landowner Incentives			X										X	
			Educ. & Outreach	X													
			Conserv. Initiatives			X											
	Native LL Pine	region-wide	Direct Influence												X		
			Educ. & Outreach	X									X				
			Mapping						X								
			Impl. Mgmt. Activities			X											
	Cape Fear Arch CBA	narrow (NC)	Landowner Incentives			X										X	
			Public Land Planning		X												
			Educ. & Outreach	X									X				
			Conserv. Initiatives			X											
	Florida Panhandle CBA	moderate (FL)	Conserv. Collaboration		X												
			Educ. & Outreach	X													
			Conserv. Initiatives			X											
			Research & Mapping					X									
	Central Florida CBA	moderate (FL)	Educ. & Outreach	X													
			Impl. Mgmt. Activities			X								X			
			Conserv. Initiatives			X											
			Educ. & Outreach	X									X				
	Dusky Gopher Frog	narrow (MS)	Impl. Mgmt. Activities			X									X		
			Research							X							
			Educ. & Outreach	X									X				
			Impl. Mgmt. Activities			X											
	Houston Toad	moderate (TX)	Research						X								
			Educ. & Outreach	X									X				
			Impl. Mgmt. Activities			X											
			Research						X								
	Patch-nosed Salamander	narrow (GA, SC)	Educ. & Outreach	X											X		
			Conserv. Initiatives			X											
			Research						X								
			NF Mgmt Planning		X												
West	Old Growth Forests	region-wide	Educ. & Outreach	X													
			Mapping								X						
			Conservation Planning			X											
			Staff Training											X			
	Central CA CBA	large (CA, NV)	Conserv. Initiatives			X											
			Educ. & Outreach	X									X				
			Conservation Planning			X											
			Forester Training											X			
	Klamath-Siskiyou CBA	moderate (CA, OR)	Educ. & Outreach	X									X				
			Impl. Mgmt. Activities			X											
			Research					X									
			Conservation Planning			X											
Lesser Slender Salamander	narrow (CA)	Educ. & Outreach	X									X					
		Research					X										
		Impl. Mgmt. Activities			X												
		Educ. & Outreach	X									X					
SE, Appal. West	Conversion	region-wide	Impl. Mgmt. Activities			X											
			Educ. & Outreach	X									X				
			Regional Planning		X					X							
			Conserv. Initiatives			X											

- Most promising options are highlighted & described:
 - highlighted green – Education & Outreach using Communication Materials: “Using materials with a desired outcome...communicate to audiences...” on the relevant subject.
 - For Primary Procurement organization (also in green) – “a Procurement Policy that reflects the ...communication themes and clearly states the expectation that suppliers promote conservation” of the relevant Specified Risk subject.
- For organizations seeking additional options:



- i. An additional option (highlighted yellow) is to “Engage and Support” relevant “Conservation Initiatives” by organizations with interest and activity in the subject area.

3) Implement your Control Measures

- a. For most companies, this will include correspondence and communication with direct suppliers.
 - i. Good record-keeping is essential to ensure that implementation is verifiable.

FINDING HELP?

1) FSC-US has posted a collection of normative and guidance materials online at:

- a. [FSC-US CW National Risk Assessment \(US NRA\) main page](#)
 - i. Maps and county lists for Specified Risk areas
 - ii. CW Regional Meeting Reports
 - iii. Specific NRA guidance for Mitigation
- b. [US National Risk Assessment Implementation Resources page](#)
 - i. Copies of implementation webinars
 - ii. Implementation Q&A documents
 - iii. Mitigation option information for all 17 Specified Risk subjects
 - iv. A short list of “Mitigation Partners”
 - v. Additional implementation and verification guidance
 - vi. A list of consulting firms (including MixedWood) offering support services

2) **MixedWood has designed its own structured and comprehensive support system for Controlled Wood clientele. Our “Controlled Wood Club” offers:**

- a. Comprehensive coverage for procurement across North America (US & Canada, but excluding AK & HI).
- b. Detailed guidance and interpretation materials for implementing the US-NRA and required Control Measures. Including document templates and checklists.
- c. Education and Outreach packages (online access) for all 17 US-NRA Specified Risk subjects
 - i. Suitable for distribution to suppliers
 - ii. Calibrated for verified conformance
 - iii. Continuously updated and supported
- d. On-call, live support from leading industry experts for US and Canada

If your company has interest FSC Controlled Wood support from MixedWood, please send email to ddsinfo@mxwood.com or call 207-864-5025. Someone will be in touch right away to discuss your situation and see whether we may be of help.

