

Structurlam Products LP
Chain of Custody Standard
Certificate Registration Code: RA-COC-001853
Forest Stewardship Council (FSC) certified April 11, 2011
Valid to: April 10, 2016

Head office and Finishing Plant:

2176 Government St.
Penticton, BC V2A 8B5
T: 250 492 8912
F: 250 492 8906

Gluing Plant

1675 Maple St.
Okanagan Falls, BC V0H 1R0
T: 250 497 6836

Mission Statement

Structurlam Products Ltd. offers a quality FSC (Forest Stewardship Council) certified Douglas Fir and Alaska Yellow Cedar glue laminated wood beam product to projects that have been identified as striving for Platinum, Gold or Silver LEEDS designation or FSC certified designations.

1. Responsibility

- 1.1 Structurlam Products has appointed Wade McDowell to have overall responsibility for the company's compliance with all aspects of this standard including labeling and marketing.
- 1.2 Sales and accounting will have the responsibility for relevant areas as detailed, according to this standard.
- 1.3 After training, all personnel will be informed and be able to demonstrate an understanding of their specific responsibilities in order to implement all the requirements of this standard.

2. Training

- 2.1 Structurlam Products shall prepare training requirements (2.3) and implement training for all designated staff and workers including Plant Manager, Shipper/Receiver, forklift operator, lumber graders, F.J. Operator, lead glue hand, lead finish hand, accounting. Initial training shall take place prior to certification. Refresher training shall be ongoing as needed. Training shall be implemented if there are personnel changes in any position related to the requirement of this standard.
- 2.2 All certification training shall be documented and kept on file with accounting.
- 2.3 Training for all designated staff shall include learning all COC procedures as a group. Individuals will also be trained in their own specific area. Copies of this standard will be given to all individuals involved and will also be posted in appropriate areas of the plant.
- 2.4 Wade McDowell will be in charge of all training.

3. Documented Procedures

- 3.1.1 The latest and most current version of this Chain of Custody standard with written procedures shall be kept up to date and made available to all relevant employees.

4. Records

- 4.1 Structurlam Products has assigned Shirley Tripps, from accounting, to be in charge of recording at a minimum, once monthly, the quantities of FSC product bought and sold as follows:
 - 4.1.1 The Sales department identifies an order as FSC when sold. The job will be identified as an FSC job on the original quote. The quote file will be given to coordination who will assign it with the next sequential job number and attach FSC to the front of the job number (e.g. Job #FSC12345). A pink job folder will be used (pink only for FSC jobs) Purchase orders issued to FSC certified suppliers will include the FSC job number and copies will be filed in lumber folder with accounting.

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- 4.1.2 When FSC certified lumber arrives and is checked off, all appropriate waybills and tallies from the truck are given to accounting and will be matched up with corresponding FSC Purchase Orders, they will then go into files waiting invoicing from FSC Certified supplier.
- 4.1.3 When an FSC job is finished and shipped the corresponding pink job file from coordination goes to accounting and is matched up with corresponding PO for invoicing.
- 4.1.4 All paperwork for a particular FSC job will be identified with the FSC job number on it.
- 4.1.5 At the end of month inventory, FSC lumber will be counted separately. The left over FSC lumber for jobs which has been completed that month will be tallied and recorded. For FSC jobs not completed at the end of month, inventory will be done both at the end of the month and at the end of the month the job is completed in. The FSC waste remaining from a particular job will be added to lumber inventory in a separate FSC designated column. Inventory will be done in FBM (foot board measure).
- 4.1.6 FSC jobs that are partially complete at the end of the month will be tallied at month-end inventory and recorded in inventory list of finished jobs on hand but not shipped.
- 4.1.7 Jobs sold as FSC certified shall be recorded as FSC jobs in the company FSC ledger.
- 4.2 An up to date list of the suppliers for Structurlam's FSC certified glulam shall be maintained and stored in an FSC binder.
- 4.3 All records related to certification, including purchase and sales documents, training records, production records, volume summaries and logo approvals shall be kept for a minimum of 5 years.

5. FSC Product Groups

- 5.1 Structurlam Products will prepare and maintain an up to date product group list of all products that may be sold as FSC certified. The product group that Structurlam Products will sell initially as FSC shall be Glue Laminated engineered wood beams – species – Douglas Fir, SPF, and Alaska Yellow Cedar. Structurlam will use the transfer system for making FSC claims and claims will be made per job order.
- 5.2 The product group list shall be publicly available upon request.
- 5.3 The unique identifier for the Douglas Fir Glue Laminated engineered wood beams will be the FSC job # (E.g. FSC12345) assigned to each job. When another species is used a new identifier will be used.

6. Sourcing and Purchasing

- 6.1 When ordering FSC lamstock, FSC shall be specified in purchase/ordering documents. Coordinators shall ensure that suppliers include COC on all waybills, invoices, etc.
- 6.2 When an FSC job has been sold, sales will inform coordination that an FSC specific job has been sold (see 4.1.1). The order will be given a job # that follows our regular sequence of job numbers but is identified as an FSC job by adding FSC to the job number (e.g. FSC 12345). This FSC specified job number will be entered on all forms of paperwork and correspondence related to that job. Coordination will verify that the supplier of FSC glulam is in possession of a valid FSC certificate (COC). Copies of supplier's FSC Certificate will be asked for and will be kept in a job file. FSC certificates will also be verified via www.fsc-info.org. The FSC certified lamstock supplier will be notified to incorporate our FSC specific job number (e.g. 12345) on all paperwork, correspondence and invoices related to FSC job.

7. Material Tracking and Production

7.1 FSC lamstock arriving at Structurlam's Glue Facility will be identified before unloading. Material will be checked and reconciled with PO and Bill of Lading. The COC # will be checked to ensure that it is on all packing list material and that labeling on package matches that on BOL, eg. "FSC Mix". Each lift of FSC material will be spray painted with yellow waterproof spray paint on the outer facing side of the lift (on the lumber wrap) with FSC. This will be done by a trained forklift operator or receiver.

7.1.1 The lifts of FSC lumber will then be stored in a designated area:

- Outside storage: Segregated area during construction.
- Inside storage: Segregated area during construction

No other lumber will be stored in these areas when FSC lumber is present.

7.1.2 Coordination will issue "Issued for Construction" paperwork. All sheets will have FSC Job # to identify it as an FSC certified job. IFC member lists, one issued by coordination to:

1. Quality Control
2. Gluing Plant Manager who issues copies to Fingerjoint Workstations, Glue end lead hand
3. Finishing Plant manager who issues copies to finishing lead hand and planer.

7.1.3 When an FSC job begins production, the required lifts of FSC lamstock lumber are brought to the lumber grading and finger jointer infeed chain. The lumber wrap with FSC marked on it will be removed and stored for future use. During an FSC project there will be no other lumber present at the lumber grading and finger jointer infeed chain. If there is any remaining FSC lamstock lumber remaining after finger jointing the required amount of ribbons it will be backed off the infeed chain and bundle wrapped with original lumber wrap stating that it is FSC. The FSC lamstock lumber will then be returned to an FSC specified storage area.

7.1.4 When FSC lumber goes through finger jointer and on to outfeed chains for sorting, ends that have been cut off for finger jointing will again be spray painted yellow and the FSC job # will be written on the end of 1 lamination that will be included in each beam.

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- 7.1.5 While beams are in jigs, a tag is stapled on the end of each beam that indicates the FSC job #, beam #, and dimensions. When the curing process is completed the beams are loaded on a truck and transported to Structurlam's finishing facility in Penticton where they are unloaded and staged to run through the planer and onto the finishing floor. The tags will remain on the ends of the beams until the beams are framed and the ends are trimmed. The corresponding job # and beam # are then written on the finished end of the beam where it shall remain adhered and visible until packaging.
- 7.1.6 Finger jointed lumber destined for Crosslam Panels will also be marked on the ends of the ribbons with yellow spray paint. These ribbons to remain separated from other ribbons destined for the panel press. Each billet will be identified with a corresponding job # and billet number upon exiting the press.
- 7.1.7 When packaging the FSC specific job number will be written on the beam label and stapled to the end of the beam on the outside of the poly wrap. The FSC job #, job name and beam number will be included on end of beam packing slip.
- 7.1.8 The beams for the FSC certified job will then be appropriately packaged together in bundles and stored together in one area of loading dock to await shipping. Finish-end paperwork for appropriate FSC job will be collected by production manager and filed in FSC specific pink job folder kept in coordination area.
- 7.1.9 All shipping documents (BOL, packing list) will include FSC Job #, Structurlam's COC #, volume, FSC % mixed claim and volume (FBM). All invoices will include the above information.
- 7.1.10 Structurlam Products shall ensure COC procedures are followed during off site processing that may take place at a subcontracted facility and shall obtain a signed outsourcing agreement. Structurlam shall ensure all outsourcing agreements are kept up to date, that contractors are trained and records of signed outstanding agreements are kept on file. Structurlam will maintain a list of subcontractors and SmartWood will be notified in case of new subcontractors.
- 7.2 Structurlam Products will be using segregated production. FSC mixed will not be mixed with other products in a FSC certified job.

8. Sales

- 8.1 Structurlam Products Ltd. shall ensure that only products manufactured entirely from FSC mix material are sold as certified. This quality control will be tracked and audited as per documented procedures outlined in this manual.
- 8.2 Structurlam Products shall ensure (through accounting) that all shipping documents and sales invoices of certified material include the following:
 - 8.2.1 The name and address of the buyer
 - 8.2.2 Structurlam's FSC chain of custody number issued by Smartwood
 - 8.2.3 The date on which the invoice was issued
 - 8.2.4 A clear indication of our product group (FSC certified Douglas Fir or Alaska Yellow Cedar laminated Engineered Wood Beams as FSC-mix.
 - 8.2.4.1 "FSC % mix" shall appear on all invoices of jobs using FSC % mix certified materials. The % mix should match the % mix that was received.
 - 8.2.5 The quantity (FBM) of FSC lumber used and the appropriate species.
 - 8.2.6 The FSC Job Number
 - 8.2.7 Shipping waybills shall include FSC job # as well as number of bundles and pieces of glulam. Structurlam's COC # and FSC claim as FSC Mix will appear on all waybills.
 - 8.2.8 The packing list and summary that will be forwarded to customer with FSC job will include FSC job # to identify it as an FSC job, individual beam numbers and quantities, FBM and weights of each beam as well as totals, shipping address, job name and contact information. Structurlam's COC # will appear on all waybills.
 - 8.2.9 Once an FSC job is shipped, paperwork will be filed in appropriate pink job folder to be invoiced by accounting.
 - 8.2.10 Reference will be made on the sales invoice of the FSC certified glulam delivered, to link the FSC certified glulam shipped, to the FSC certified lamstock purchased.

8.2.11 Each time FSC-certified lamstock is ordered by coordination, the supplier's validity and scope of COC certificate shall be verified via www.fsc-info.org, or by contacting Smartwood. Coordination shall ensure that the correct FSC category of FSC lamstock ordered is received and will ensure that suppliers provide this information. Accounting will ensure the FSC percentage content is claimed.

9. Promotional use of Trademarks

- 9.1.1 Structurlam Products does not use any on product labeling that refers to FSC.
- 9.1.2 Structurlam Products shall submit all FSC claims to Rainforest Alliance for review and approval prior to use, including:
 - 9.1.3 Promotional off product claims that reference FSC.
 - 9.1.4 Promotional use of the FSC trademarks (Forest Stewardship Council, FSC, checkmark tree logo)
 - 9.1.5 Structurlam shall comply with standard FSC STD 50-001 (V1-2) for off product labeling.
- 9.4 Structurlam Products shall have a secure system that ensures FSC trademarks are only used for those products included in the FSC product group list and produced from FSC mixed material.
- 9.5 Once use of FSC off product labeling is used, the label and application shall not be modified without prior approval from Smartwood.
- 9.6 Structurlam Products may not use FSC on-product labels together with the logos or names of other forest management conformity assessment schemes or any claims referring to the sustainability of the forest from which the wood is sourced.
- 9.7 If the FSC label is used on products or packaging where there is a risk of confusion between the FSC-certified material and other non FSC-certified materials (e.g. non-certified product in certified wooded box), an additional visible claim shall be used to explain what content is FSC-certified. In such cases the FSC label shall not be applied on the non-certified element of the product.

- 9.8 If Structurlam Products labels products with labels designed by the buyer or with the buyer's FSC certificate code, the company shall seek approval from Rainforest Alliance and follow Rainforest Alliance's guidance.
- 9.9 If non-certified buyers request the company to label FSC products with the buyer's brand name, Structurlam shall seek approval from Rainforest Alliance and follow Rainforest Alliance's guidance.

10. PROCEDURES FOR NON-CONFORMING FSC PRODUCTS

FSC defines non-conforming products as "product or material for which an organization is unable to demonstrate that it complies with FSC eligibility requirements for making claims and/ or for using the FSC on-product labels."

Examples are (but not limited to):

- supplier sold non-FSC stock in place of FSC stock
- accidental mix of non-FSC materials into an FSC job
- FSC stock purchased, but supplier was not FSC certified or certificate was suspended at the time of purchase

It is the responsibility of any and all employees when they become aware of anything they know/believe that prohibits the job from conforming to FSC guidelines to follow the appropriate procedure(s) below:

In case non-conforming products are detected after they have been delivered, Structurlam Products shall:

- a) Immediately cease to sell any non-conforming products;
- b) Identify all relevant customers, and advise those customers in writing within seven (7) business days of the non-conforming product and maintain records of that advice;
- c) Analyse causes for occurrence of non-conforming products and implement measures to prevent its re-occurrence.
- d) Notify Rainforest Alliance;
- e) Cooperate with the RA in order to allow the certification body to confirm that appropriate action is taken to correct this non-compliance.