

Elizabeth Baldwin

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## A Quick Look at Lacey Due Diligence Actions



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## Four Categories for Compliance Due Diligence

1. Communication with your Supplier
2. Legal Language
3. Gathering Documentation
4. Organizing and Evaluating the Documentation.



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## Communication with your Supplier

1. Survey
2. Educate and Network



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# Survey

## Supplier Questionnaire

Supplier Name: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Telephone: \_\_\_\_\_ email: \_\_\_\_\_

Questionnaire completed by:

\_\_\_\_\_ (Printed Name) \_\_\_\_\_ (Title)

\_\_\_\_\_ (Signature) \_\_\_\_\_ Date Submitted

### **Sources of Supply:**

What percentage of your wood is derived from your own concessions/forests?

0% - 25%       26% - 50%       51% - 75%       76% - 100%

Does your company have a system for the traceability of wood sources?

Yes     No

If yes, are records maintained?

Yes     No

Do you require your suppliers to provide a statement of compliance regarding legality of wood products you purchase?

Yes     No

Do you collect any copies of documentation from your suppliers regarding the legality of wood products?

Yes     No

If yes, please list some of the documentation collected and the governing agencies.



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## Educate and network your suppliers.

1. Teach them biology.
2. Give them tools for data organization.
3. If they are having trouble getting information, help them with the sourcing.



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## Legal Language

1. Put Text in your Purchases orders that requires production to be made of legally sourced material.
2. Require documentation with every shipment.

Purchase Order  
to be supplied ha  
sold in compliance with  
national laws or regulations that  
of plants; the taking of plants from  
officially designated area; the taking of plants  
officially protected area; or the taking of plants  
products to be supplied. Vendor also assures Buy  
appropriate royalties, taxes, or stumpage fees as require  
applicable national laws or regulations.  
Vendor further agrees to declare and label all plant products in  
compliance with the laws of the United States and to provide adeq  
onable proof and verification of any declarations made to Bu  
to plant products which are sold and shipped to Buyer or its  
origin, composition of product or other failure to comply with  
result in the assessment of product or other failure to comply with  
the seizure and/or forfeiture of non-complying shipme  
and agrees to hold harmless and indemnify Buyer  
other costs Buyer incurs as a result of Vendor  
advertent, in compliance with any law  
practices and procedures.



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# Gathering Documentation

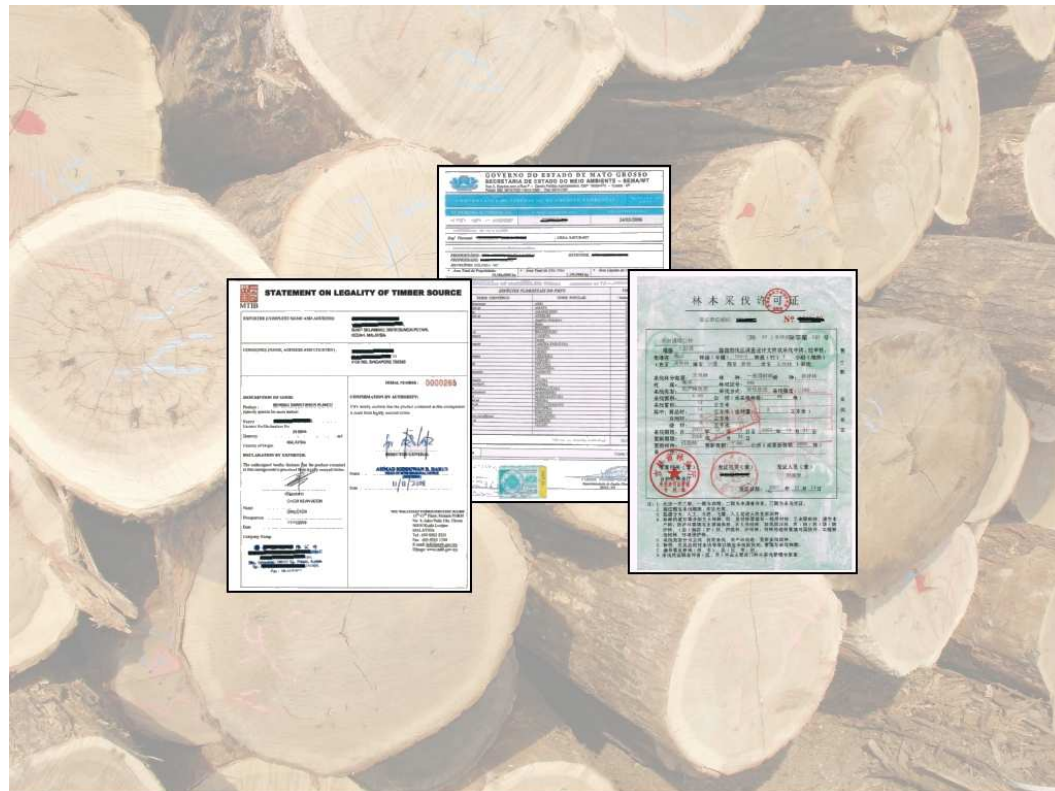


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“Proof of legality should be fact-based not document-based.”



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# Organizing and Evaluating the Documentation

ADO

Project Type	Year	Product Number	FC	Description	Open Source License	Open Source License	Open Source License	Documentation Provided	Page Count	File Type	Access
Experimental - my hand	2014	101	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2015	102	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2016	103	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2017	104	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
Experimental - my hand	2018	105	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2019	106	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2020	107	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
Experimental - my hand	2021	108	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2022	109	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open
	2023	110	FC	Experimental - my hand	Open Source License	Open Source License	Open Source License	Documentation Provided	100	PDF	Open



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A few thoughts to close on:

1. Legality documentation is here to stay and it's not just for the USA!
2. Certification is not the answer. (It's part of the answer, but sometimes it's also part of the problem.)
3. Finally, buying based on legality alone is not enough.



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Thank you  
for your time and interest.

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