

	<b>SGS QUALIFOR</b> (Associated Documents)	Doc. Number:	<b>AD 54-F-01</b>
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## CONTROLLED WOOD RISK ASSESSMENT REPORT

(To be used with the RD 15-01 - Guideline - Approach and criteria for assessing risk when uncertified controlled wood is used in FSC certified products)

This template is a guideline to do the risk assessment and must not be seen to include all information. Any other sources of information may be added to ensure that all detail were analysed.

This assessment must be done on each supplier of uncertified wood that will be used in FSC products as controlled wood.

If it is determined that the supplier is classified as being from an unspecified source the requirements of the RD 16-01 - Guideline - Requirements for company verification program must be followed. This will be audited annually.

### A CERTIFIED COMPANY DETAIL

<b>Company Name:</b>		Rowlinson Garden Products Ltd	
<b>Certificate Number</b>		SGS-COC-0373	
<b>Country:</b>		United Kingdom	
<b>Company Address</b>		<b>Green Lane, Wardle, Nantwich, Cheshire</b>	<b>CW5 6BN</b>
<b>Contact detail:</b>	<b>Contact person:</b>	Peter Penlington	
	<b>Telephone:</b>	01829 262 824	
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	<b>e-mail Address</b>	<a href="mailto:peter.penlington@rowgar.co.uk">peter.penlington@rowgar.co.uk</a>
<b>Assessment done by:</b>		Peter Penlington
<b>Relation to the company:</b>		Group Environmental Co-ordinator
<b>Date:</b>		01/10/2008
<b>Signature</b>		<i>P. J. Penlington</i>

**B SUPPLIER DETAIL**

<b>Company Name:</b>		KDM International		
<b>Country:</b>		U.K.		
<b>Company Address</b>		<b>The Havens Ransomes Europark, Ipswich Suffolk</b>	<b>IP3 9SI</b>	
<b>Contact detail:</b>	<b>Contact person:</b>	Steve Henry		
	<b>Telephone:</b>	01473 276 900		
	<b>Mobile phone:</b>	N/A		
	<b>Fax:</b>	01473 276 911		
	<b>e-mail Address</b>	<a href="mailto:steve@kdm.co.uk">steve@kdm.co.uk</a>		
<b>Risk Assessment Level</b>		<b>Country</b>	<b>District</b>	<b>FMU</b>
		Low	Low	Low
<b>Product being supplied</b>		<b>Species</b>		<b>Volumes</b>
WHITEWOOD - GERMAN PEFC		Picea Abies		244.01M3

<b>Type of source e.g. natural forest or plantations and general description of the</b>	Natural Forest
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supplier	
Results (Low or High and motivation:	Risk – Low Motivation – The source is German PEFC independent accredited supplies only, which occupies the 14th position in the Transparency International Corruption Perceptions Index.

## C COMPANY POLICY AND RISK ASSESSMENT

The company has a publicly available written policy commitment, endorsed by the most senior management level of the company, to implement its best efforts to avoid trading and sourcing wood or wood fibre (herein referred to as wood) from the following categories:

1. **This organization is committed to the responsible purchasing of forest products.**  
Our long-term intention is that all timber used in products that we purchase or specify is sourced from well-managed forests that have been certified to credible certification standards, and/or are from post-consumer recycled materials.
2. **This commitment will be realized through a stepwise approach** to responsible purchasing that uses the best available techniques and information.
3. This organization will not source products containing timber, fibre, and other raw materials if the following apply:
4. The source forest is known or suspected of containing high conservation values, except where the forest is certified or in progress to certification under a credible certification system, or the forest manager can otherwise demonstrate that the forest and/or surrounding landscape is managed to ensure those values are maintained.
5. The source forest is being actively converted from natural forest to a plantation or other land use, unless the conversion is justified on grounds of net social and environmental gain, including the enhancement of high conservation values in the surrounding landscape.
6. The material was illegally harvested or traded.
7. The material was traded in a way that drives violent armed conflict or threatens national or regional stability (i.e., what is commonly called *conflict* timber).
8. The harvesting or processing entity, or a related political or military regime, is violating human rights.
9. The material is sourced from genetically modified trees.
10. The source forest is unknown.  
**To ensure that these goals are achieved, this organization will**
12. **Scrutinize all suppliers of forest products**
13. **Seek information on the source** of the wood, fibre or other forest materials in the products we purchase and the circumstances under which they were harvested.
14. **Seek information on the chain of custody** of the forest products we purchase, including the circumstances under which they were manufactured and traded.

15. **Work with and encourage suppliers and forest sources** that are actively engaged in a process of time-bound, transparent, stepwise commitment to credible certification (such as WWF Forest and Trade Network participants in producer countries).

The risk assessment publicly available on the Company web site [www.rowgar.co.uk](http://www.rowgar.co.uk)

<b>Where and how is the policy available:</b>	The company has a policy on hand signed by senior management at their offices and their web site.
<b>Signed by:</b>	<i>P. J. Penlington</i>
<b>Position in company:</b>	Group Environmental Co-ordinator
<b>Where and how is the risk assessment available:</b>	The risk assessment is available on the FSC Risk Register, SGS Qualifor and from the company offices.

## D SPECIFIC REQUIREMENTS FOR EACH FSC CONTROLLED WOOD CATEGORY

### 1. ILLEGALLY HARVESTED WOOD

- 1.1 The district of origin may be considered low risk in relation to illegal harvesting when all the following indicators related to forest governance are present:

Requirements	Examples of sources of information	Finding & Evidence	Result	
			High	Low
1.1.1 Evidence of enforcement of logging related laws in the district	<a href="http://www.Transparency.org">http://www.Transparency.org</a> The Royal Institute of International Affairs ( <a href="http://www.illegal-logging.org">www.illegal-logging.org</a> ); Environmental Investigation Agency ( <a href="http://www.eia-international.org">www.eia-international.org</a> );	Logging laws enforced by the German Forest Authority. No evidence of corruption or other illegal activities noted on the websites available.	Low Risk	
1.1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.	Global Witness: ( <a href="http://www.globalwitness.org">www.globalwitness.org</a> ); <a href="http://ec.europa.eu/comm/development/body/the_me/forest/initiative/index_en.htm">http://ec.europa.eu/comm/development/body/the_me/forest/initiative/index_en.htm</a> Transparency international index ( <a href="http://www.transparency.org">www.transparency.org</a> ) Corruption perceptions WWF ( <a href="http://www.panda.org">www.panda.org</a> );	No reports identify illegal activities in the websites available.	Low Risk	
1.1.3 There is little or no evidence or reporting of illegal harvesting		No reports identify illegal activities in the websites available.	Low Risk	

	in the district of origin.		
1.1.4	There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade	NGOs and involved stakeholders  <a href="http://www.transparency.org">[www.transparency.org]</a>	No incidence of corruption noted in the country or districts noted on the websites available.  Low risk

## 2 WOOD HARVESTED IN VIOLATION OF TRADITIONAL OR CIVIL RIGHTS

2.1 The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when all the following indicators are present:

Requirements	Examples of sources of information	Finding & Evidence	Result	
			High	Low
2.1.1 There is no UN Security Council ban on timber exports from the country concerned;	FSC Standard for Non FSC	There is no UN ban or on timber exports from Germany	Low	
2.1.2 The country or district is not designated a source of conflict timber (E.g. USAID Type 1 conflict timber);	<a href="http://ec.europa.eu/development/policiesgen_en.cfm">http://ec.europa.eu/development/policiesgen_en.cfm</a>	The country is not designated a source of conflict timber	Low Risk	
2.1.3 There is no evidence of child labour or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the country concerned	FSC National Initiatives and Regional Offices contacts <a href="http://www.fsc.org">www.fsc.org</a>	No evidence of child labour or breaches of the ILO Fundamental Principles and Rights taking place in the forestry sector.	Low risk	
2.1.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in	FSC National Initiatives and Regional Offices contacts <a href="http://www.fsc.org">www.fsc.org</a>  Swedish Forest Agency Quantifiable Policy Objectives ratified by Parliament.  <a href="http://ec.europa.eu/development/policiesgen_en">http://ec.europa.eu/development/policiesgen_en</a>	There are no known conflicts of substantial magnitude.	Low	

the district concerned;	.cfm		
2.1.5	There is evidence of no violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.	FSC National Initiatives and Regional Offices contacts <a href="http://www.fsc.org">www.fsc.org</a>	There is no evidence of violation of indigenous and tribal people's rights in the district on available web sites as recorded on this assessment.
			Low

### 3 WOOD HARVESTED FROM FOREST IN WHICH HIGH CONSERVATION VALUES ARE THREATENED BY MANAGEMENT ACTIVITIES

3.1 The district of origin may be considered low risk in relation to any threat to high conservation values if:

- a) indicator 3.1 is met; or
- b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1

Requirements	Examples of sources of information	Finding & Evidence	Result	
			High	Low
3.1.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant high conservation values;	<a href="http://www.worldwildlife.org/science/ecoregions.cfm">http://www.worldwildlife.org/science/ecoregions.cfm</a> Those regions identified by Conservation International as a Biodiversity Hotspot (or) Those ecosystems and communities that are explicitly identified by Conservation International as a key component of a <i>Biodiversity Hotspot</i> Greenpeace ( <a href="http://www.intactforests.org">www.intactforests.org</a> )	No evidence of bio diversity hotspots as recorded in <a href="http://www.worldwildlife.org">www.worldwildlife.org</a> or other HCVF areas. All felling is monitored by the German Forest Agency.	Low	
3.1.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the eco-region;	FSC National Initiatives	Effective legislation is in place under German law. FSC national initiatives contacted showed no untoward activities. Websites researched as indicated showed no untoward activity.	Low	

#### 4 WOOD HARVESTED FROM AREAS BEING CONVERTED FROM FORESTS AND OTHER WOODED ECOSYSTEMS TO PLANTATIONS OR NON-FOREST USES

4.1. The district of origin may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicator is present:

[Note: the change from plantations to other land uses is not considered as conversion].

Requirements	Examples of sources of information	Finding & Evidence	Result	
			High	Low
4.1.1 There is no net loss AND no significant rate of loss (> 0.5% per year) of natural forests and other naturally wooded ecosystems such as savannahs taking place in the eco-region in question	German Forest Agency web site. FSC National Initiatives and Regional Offices contacts <a href="http://www.fsc.org">www.fsc.org</a> <a href="http://PEFC/Greenpeace.org.uk">PEFC/Greenpeace.org.uk</a>	German forest policy aims to promote multi function forests. Websites researched showed no substantial impacts.	Low	

#### 5 WOOD FROM FORESTS IN WHICH GENETICALLY MODIFIED TREES ARE PLANTED

5.1 Requirements related to wood from forests in which genetically modified trees are planted

Requirements	Examples of sources of information	Finding & Evidence	Result	
			High	Low
5.1.1 The district of origin may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is complied with:  a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned. OR  b) Licenses are required for	FAO, 2004. Preliminary review of biotechnology in forestry, including genetic modification. Forest Genetic Resources Working Paper FGR/59E. Forest Resources Development Service, Forest Resources Division, Rome, Italy. Available online: <a href="http://www.fao.org/docrep/008/ae574e/AE574E00.HTM">http://www.fao.org/docrep/008/ae574e/AE574E00.HTM</a>  National and regional data sources	No genetically modified forest trees or trials cited on websites available.	Low	

<p>commercial use of genetically modified trees and there are no licenses for commercial use OR</p> <p>c) It is forbidden to use genetically modified trees commercially in the country concerned.</p>			
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## 6 GENERAL

Requirements	Examples of sources of information	Finding & Evidence	Result	
			High	Low
General search on the country	e.g. Google	Showed no illegal or untoward activities committed.	Low	

End of report