



SUMMARY OF NLBMDA COMMENTS

June 25, 2009

NLBMDA recognizes the important role lumber from sustainably managed forests plays in building and maintaining the infrastructure of our society. Lumber from sustainably managed forests is one of the few renewable resources that enhance the environment rather than detract or degrade it. NLBMDA fully supports those responsible forest management practices that promote sustainability, and result in long term environmental benefit. NLBMDA recognizes that there are a variety of different, credible sustainable forestry management systems in place throughout North America and the World.

- The NLBMDA recommendation distinguishes between forest certification (the standing forest), and a lumber product standard and certification (the product). PS-20 is a Voluntary Product Standard.
- Absent a product standard, the chain-of-custody requirements and associated handling costs for **raw material** from a certified forest flows to every participant in the lumber supply channel – as though the “product” did not exist. Once a softwood log is milled into lumber, the forest of origin won’t change. Label the product to PS-20 defined standard with ALSC Grade Agency oversight.
- For more than fifty years the industry has recognized the grade stamp as **the** official product label. All channel participants rely of the lumber grades to specify product (design values, sourcing specs, code compliance, etc). The grade-stamping of lumber is an efficient and reliable process.
- Currently producers utilizing certified raw material are not labeling their products. Further, mills almost never apply the forest certifier’s branded labels to their products, at best printing the brand label on the wrapper of the shipping unit. The forest certifier’s branded labels describe raw material and are generic, not product specific. Further, each certification system has multiple labels -- all unique to the brand, creating confusion in the channel and marketplace.
- Interest in sustainable forestry is a matter of US public policy, and international treaty, via the Montreal Process. The need for sustainable resources (forests) and sustainable products (lumber) is in the public’s interest.

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- Multiple credible forest certification systems operate today and others may enter the field. The NLBMDA recommends the ALSC, in consultation with US Department of Agriculture, Forest Service, determine which certification schemes it will recognize. The USDA Forest Service is the agency responsible for the Nation's report on Sustainable Forests, Montreal Process.
- NLBMDA recommends the forest certifiers continue to certify the standing forests and chain-of-custody for raw material from forest to the point of production (receipt of certified log by the mill). Within the mill, responsibility to certify proper handling and chain-of-custody (non-mixing) would transfer to the ALSC accredited Lumber Grade Agency currently certifying the mill's output/grade-stamp. This would be a new process audit within the Grade Agency's product certification/grade-stamp.
- NLBMDA recommends adding a sixth element to the existing grade-stamp, covering the attribute of sustainable forest origin or eco-origin. The chain-of-custody hand-off from forest certification system to product certification would occur as the raw material entered the mill. Within the mill, certification would fall under the ALSC accredited Grade Agency certifying all aspects/processes of lumber production and the grade-stamp. (If the grade-stamp is reliable enough to document the strength of the product -- public safety -- it should be reliable enough to document sustainable forest origin.)
- NLBMDA views this recommendation as a supply chain enhancement, utilizing a proven product standard and certification regime. The recommendation would provide a brand neutral, cost-effective, and permanent on-product label by producer – as the grade-stamp does today. A attribute defining the lumber product origin as a sustainable forest complements the scope of PS 20-05 and brings clarity and certainty to distributors, users and consumers of dimensional softwood lumber products relative to any green marketing claims or assumptions created in the marketplace relative to a products eco-origin.
- A 6th element grade stamp in no way limits the ability of a manufacturer to also apply the forest certifier's brand label as long as it is 6 inches from the grade stamp, nor would it supplant or circumvent any forest management certification scheme's chain of custody requirements or any other element of their standard.