Introduction

Starfire Lumber is committed to achieving and implementing the SFI® Program Principles of Sustainable Forestry. The following SFIS Procurement Programs direct the actions, activities and management of Starfire Lumber’s employees as they procure primary raw material to support their manufacturing facility in Cottage Grove, Oregon.

The following SFIS Procurement Programs were developed to address each of the requirements of the SFI Standard Objectives, Performance Measures and Indicators that pertain to Starfire’s operations.

OBJECTIVE 8: LANDOWNER OUTREACH

Starfire Lumber has an active program in place to provide regionally appropriate SFI information to forest landowners. The program addresses Best Management Practices (BMPs), reforestation, visual quality management, and conservation of wildlife habitat elements, threatened and endangered species, Forests with Exceptional Conservation Value, management of harvest residue, control of invasive exotic plants and animals, and characteristics of special sites.

State SFI Implementation Committees, State Extension offices, State Forestry Departments, and organizations, such as OFRI produce educational publications and brochures for distribution to landowners.

Starfire Lumber’s promotion program involves: 1) supplying information packages and services directly to landowners where the company purchases stumpage and has direct control over the harvesting, and 2) encouraging wood producers to pass information on to landowners they purchase wood from.

Starfire Lumber’s procurement staff provides information directly to landowners stating the company’s commitment to SFI and where they can find more information about regionally appropriate information about BMP’s, reforestation, visual quality management, and conservation of wildlife habitat elements, threatened and endangered species, Forests with Exceptional Conservation Value, management of harvest residue, control of invasive exotic plants and animals, and characteristics of special sites.

Starfire Lumber’s procurement staff will also provide SFI Information Packets with brochures, fact sheets and other relevant information directly to landowners upon request. Contract language includes additional requirements addressing implementation of BMPs, forestry guidelines, and compliance with relevant laws and regulations.

When Starfire Lumber purchases primary raw materials through wood producers as defined in the SFI Standard, the company sends a letter to the wood producer and upon further request will provide SFI Information Packets for distribution to indirect sources. In addition, suppliers are required to complete a supplier declaration statement that describes Starfire’s commitment to SFI standards and requests the landowner to declare that the raw material being purchased meets those standards. If the wood producer would like additional copies, they may contact company representatives and request additional SFI Information Packages. Interested parties are also encouraged to contact the SFI Program SICs, state agencies, or university programs for other sources of sustainable forestry information.
Starfire Lumber evaluates the effectiveness of the SFI promotion program as part of the annual management review (Objective 20), and sets goals for continual improvement.

This program is the responsibility of the Procurement Manager.

**OBJECTIVE 9: USE OF QUALIFIED RESOURCE AND QUALIFIED LOGGING PROFESSIONALS**

Starfire Lumber actively encourages landowners to utilize the services of qualified resource professionals and qualified logging professionals in applying principles of sustainable forest management on all forest ownerships.

Starfire Lumber’s Procurement Manager and other qualified procurement staff provide qualified resource professional services to forest landowners when purchasing raw material. All Starfire Lumber procurement staff has been trained on the principals, objectives and programs of the SFI Program.

Starfire Lumber requires its contract loggers and encourages wood producers and suppliers to attend Logger Training Programs sanctioned by the SIC, or regional logger education programs. In some cases, especially on the lands of Native American tribes, a particular contract may require specific logging contractors be used. In some of those cases, the contractor may not have attended a Logger Training Program. Where this is the case, Starfire Lumber encourages the contractor to attend Logger Training classes. Where Starfire Lumber has the authority and directly contracts with loggers, the company requires each logging contractor to be trained and to maintain their training through continuing education.

Starfire Lumber also encourages its wood producers and suppliers to promote the use of qualified resource and logging professionals on other forest ownerships. This is communicated directly to the wood producers and suppliers through written correspondence.

Starfire Lumber will review the Oregon Professional Loggers and the Washington Contract Loggers Association Master Loggers list on a yearly basis.

This program is the responsibility of the Procurement Manager.

1 Exceptions are made to meet specific requirements for indigenous people’s workers rights established by tribal forestry leadership.

**OBJECTIVE 10: ADHERENCE TO BEST MANAGEMENT PRACTICES**

Starfire Lumber requires all logging contractors working on Starfire purchased stumpage sales to complete a SFI recognized training program. In order to be eligible to contract with Starfire Lumber, contractors must have completed the training requirements as sanctioned and approved by specific SFI Implementation Committee’s (SICs), or they must be enrolled to complete the necessary training at the first opportunity. A trained contractor must be in full compliance with a SIC logger training requirements for completing SFI core courses as well as continuing education requirements. If a contractor meets the current requirements of the State where they received training, they are considered trained and may work in any State where the company procures wood.
Documentation of training, including state training databases and certificates are kept on file for loggers contracting directly with Starfire Lumber. All contract loggers are required to carry workers compensation insurance as specified in each state and records are kept on file in the accounting office.

Contractors performing road-building services will either be trained through a recognized SFI training program or receive on-the-job training in applicable State forestry guidelines or BMP’s and Starfire Lumber’s procedures by a trained professional.

Starfire Lumber encourages its wood producers to ensure that their contract loggers are also qualified logging professionals. This is communicated to the wood producers through a formal letter.

The Procurement Manager provides contractors with information on training sanctioned by the SICs. In addition to the training available from the SICs, Starfire Lumber Procurement Managers provide on-the-job training and contract administration as appropriate to the situation.

“Other wood suppliers” including small-scale tree service and land clearing operators are encouraged, but not required to be trained. These operators are not full-time professional loggers.

This program is the responsibility of the Procurement Manager.

1 Exceptions are made to meet specific requirements for indigenous people’s workers rights established by tribal forestry leadership.

**Best Management Practices on Purchased Stumpage Tracts**

Starfire Lumber has a program in place to comply with BMPs on purchased stumpage tracts where the company has a contractual agreement with the forest landowner. In these cases, the company works with the contract logger to ensure that appropriate BMPs are implemented.

The program is implemented through the administration of the logging contract. Contract loggers are required to implement BMPs as part of the signed contract. The Procurement Manager administers an internal harvest inspection report to assess implementation of BMPs. Starfire Lumber also reviews state harvest inspection forms to assess implementation of BMPs.

This program is the responsibility of the Procurement Manager.

**Adverse Weather Conditions**

Starfire Lumber has a program to address adverse weather conditions. The Company takes appropriate steps to plan its mill inventories, procurement activities and operations to avoid adverse weather conditions in order to protect water quality and soil productivity.

Where Starfire Lumber directly purchases wood from forest landowners, its Procurement Manager will use some or all of the following procedures to plan for and manage adverse weather conditions, including:
1. Follow all applicable state forestry Best Management Practices (BMP’s) and local regulations in the harvesting of timber and construction of roads, landings and skid trails.

2. Identify when soil and road conditions are not conducive to forest management and logging activities and plan such activities when conditions are more favorable.

3. Temporarily suspend harvesting operations until weather and soil moisture conditions improve.

4. Schedule “wet weather” jobs that may have the potential for a detrimental impact during wet weather, to be harvested during periods of suitable weather within landowners requirements.

5. Use practices and materials as appropriate to stabilize roads, minimize erosion, and improve accessibility during adverse weather.

When Starfire Lumber purchases wood from wood producers, the Procurement Manager will discuss the company’s wet weather policy. The company will not provide direct supervision or oversight with loggers working for wood producers.

This program is the responsibility of the Procurement Manager.

**Verifiable Monitoring System**

Starfire Lumber has a verifiable monitoring system to evaluate the effectiveness of its promotion of reforestation and use of BMPs across its wood and fiber supply area, and uses that information to set goals for continual improvement, consistent with the annual management review.

For stumpage purchases, Starfire Lumber provides a letter to landowners as well as SFI Information Packets upon request.

When wood is procured through wood producers, the company provides a letter and encourages them to hand out SFI Information Packets to their suppliers and/or landowners.

Starfire Lumber monitors harvest operations on stumpage sales and completes a harvest inspection form addressing whether or not BMPs have been implemented and reforestation intent. Starfire Lumber also reviews state harvest inspection forms to assess implementation of BMPs.

Starfire Lumber uses state forestry association reports and analysis to assess reforestation trends across its wood and fiber supply area. The Company also uses State BMP Monitoring Reports and other appropriate sources of information to assess the use of BMPs across its wood and fiber supply area.

Information gathered in the verifiable monitoring system is used to set goals of improving the rates of BMP compliance over time.

Starfire Lumber will meet annually.
OBJECTIVE 14: LEGAL AND REGULATORY COMPLIANCE

Starfire Lumber has a commitment to comply with and a system to ensure they meet applicable federal, provincial, state, and local forestry, related social and environmental laws and regulations.

The system to achieve regulatory compliance involves:

1. A commitment to achieve regulatory compliance.
2. Contract provisions with loggers and producers specifying legal compliance.
3. Training of appropriate personnel in applicable regulations.
4. Corrective and preventive action, where appropriate.
5. Management review and continual improvement.

Starfire Lumber has a commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.

This commitment is demonstrated by various policy statements in employment applications, hiring packets, invoices and contracts. In addition, Starfire Lumber has an official company policy handbook/manual outlining their commitment to applicable state and federal regulations.

If a regulatory compliance issue were to be uncovered by either company staff or regulatory agency personnel, the company is committed to take prompt corrective action to mitigate any environmental impacts.

When Starfire Lumber purchases wood fiber from wood producers, and does not have a contract with the individual landowner, the company has limited influence to ensure regulatory compliance. The company does specify compliance with legal and regulatory requirements through the wood purchase contract.

This program is the responsibility of the Procurement Manager.

OBJECTIVE 15: FORESTRY RESEARCH, SCIENCE, AND TECHNOLOGY

Starfire Lumber Co. actively participates in our state SFI Implementation Committee. In addition, Starfire management serves as board members on several various forestry, wood products and community associations. Starfire Lumber Co. also provides monetary support to various forest management, water quality, wildlife management, ecological, biological and community social issues.

OBJECTIVE 16: TRAINING AND EDUCATION

Starfire Lumber actively participates in our state SFI Implementation Committee. Information from this source and various other associations are communicated to
applicable staff members. Also, applicable staff members are on the email list of SFI and are kept abreast of new and emerging rule changes, etc. At least annually, a meeting of all staff associated with SFI is held to review updates, changes and processes.

OBJECTIVE 17: COMMUNITY INVOLVEMENT IN THE PRACTICE OF SUSTAINABLE FORESTRY

Starfire Lumber Co. actively participates in our state SFI Implementation Committee. In addition, Starfire management serves as board members on several various forestry, wood products and community associations. Starfire Lumber Co. also provides monetary support to various forest management, water quality, wildlife management, ecological, biological and community social issues.

Starfire Lumber provides links to various government agencies, organizations and websites that promote the values of sustainable forestry and provide research and educational materials to interested parties. These links are provided in written materials and through our website: www.starfirelumber.com.

Starfire Lumber has a formal process for receiving and responding to public inquiries, particularly those that potentially relate to practices that appear to be inconsistent with the SFIS Principles and Objectives.

If a phone call or other public inquiry comes in to Starfire Lumber, the message will be forwarded to Sean Smith. Sean will follow up with the person or organization making the inquiry if the operation or activity occurred on purchased stumpage. If the operation or activity occurs on other tracts where the company does not have a stumpage purchase agreement, the individual(s) making the inquiry will be given the necessary information to contact the appropriate SFI Program SIC Inconsistent Practices Committee or other group or agency, as appropriate, for resolution.

This program is the responsibility of the Procurement Manager.

OBJECTIVE 19: COMMUNICATIONS AND PUBLIC REPORTING

Starfire Lumber participates in an annual, third-party audit of our process and procedures. The summary audit report is posted on SFI website.

Starfire keeps electronic copies of all progress reports, audit reports and other items pertaining to the conformance to SFI standards. Current certifications are posted to our website for public review.

OBJECTIVE 20: MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

Starfire Lumber has a system for annually collecting information about its SFI implementation, evaluating the effectiveness of the program, reporting information to management, determining whether any changes or improvements are necessary to continually improve SFIS conformance, and communicating those changes to responsible personnel.

The Procurement Manager conducts periodic harvest inspections using the harvest inspection form and gathers inspection information from state agencies. This
information is consolidated and used to prepare an annual summary of patterns and trends.

The Procurement Manager reviews the Program to promote qualified resource and logging professionals and determines whether any changes or improvements should be made.

The Procurement Manager presents recommendations and changes to Starfire Lumber’s SFI Implementation Team. The SFI Implementation Team determines what changes and improvements should be made throughout the company.

Any changes and improvements are incorporated into the SFI Implementation Policy, Indicators and Evidence Summary, and applicable SFIS Programs. The revised documents are then communicated to the employees. Any necessary training will be organized as appropriate.

Starfire Lumber’s SFI Implementation Team will meet annually during their annual meetings.

By implementing the above Programs and Procedures, Starfire Lumber continually improves its performance and achieves its objective of practicing and promoting sustainable forest management.

**System for Collecting, Reviewing and Reporting Information**

Starfire Lumber has a system for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.

The SFI Implementation team consists of all of the Starfire Lumber management.

The SFI Implementation team will review 3rd party audit summaries and documentation on an annual basis. The team will also review the SFI annual report. Information will be gathered by the appropriate staff member and prepared for the annual meeting.