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**Scientific Certification Systems – Forest Conservation Program**

## **Chain of Custody Certification Report**

**for:**

**Senior Paper Corp<sup>1</sup>**

**SCS-COC-004513**

Codes are not official and cannot be used until certification has been granted by SCS

### **Type of Audit: Evaluation**

(Evaluation, 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> Surveillance, Re-Evaluation, Expansion of Scope)

**Audit for the Year 2013**

**Date Report Finalized: February 21, 2013**

**Date of Current Certificate Issuance: Pending**

**Contact person for certificate: Tom Eisenmann Jr.**

**Organization Street Address: 200 N. Bradford Ave., Unit O**

**Zip or Postal Code: 92870**

**City, State, Country: Placentia, California, USA**

**Phone: 714.724.8654 or 714.606.8654**

**Fax: 775.703.6811**

**Email: [tomjr@seniorpaper.net](mailto:tomjr@seniorpaper.net)**

**Website: [www.seniorpaper.net](http://www.seniorpaper.net)**

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<sup>1</sup> Legal name of company and trade name(s) where applicable



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# Introduction

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SCS developed its Forest Conservation Program in 1991 and has since emerged as a leading certifier of forest management operations and wood product manufacturers. In 1996, SCS became one of the first certification bodies in the world to be Forest Stewardship Council (FSC) accredited. In 2009, SCS achieved accreditation to offer PEFC (Programme for the Endorsement of Forest Certification) chain of custody certification services.

Through a well-developed network of regional representatives and contractors, SCS offers timely and cost-effective certification services around the world.

Chain of Custody certification is a quality assurance to your customers that your products have positive environmental attributes that are backed by a global system of verification. When you receive a chain of custody certificate, you gain the right to use the program's logo and trademarks both on your products and in business and marketing communications. The certification label helps businesses and customers make purchasing decisions that support sound forest management.

This report presents the findings of the SCS auditor who has evaluated your organization's systems and performance against the applicable Chain of Custody standard(s) and the SCS staff member who has made the final certification decision (see section 1 below).

If there are any necessary follow-up actions required by your organization, these are outlined in a separate Corrective Action Request form sent with this report. In order to achieve and maintain Chain of Custody certification, it is important that all nonconformances are resolved by their stated deadlines.

If you have any questions, comments, or concerns about SCS's Chain of Custody Program, please feel free to contact any member of the SCS Chain of Custody Program.

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Fax: +1 510 452 6882  
Email: [AWiskind@SCSGlobalServices.com](mailto:AWiskind@SCSGlobalServices.com)

## Section 1: Evaluation Process and Conclusions

PART 1A: Certification Decision		
<p><b>Auditor's recommendation for initial, continued or re-certification based on conformance with requirements:</b> Include recommendation for each applicable standard and version that the organization was evaluated against, and per site where applicable.</p>	<p>Senior Paper is in compliance with FSC standard FSC-STD-40-004 v.2.1. Auditor recommends initial certification.</p> <p><i>All certificate holders are assessed against FSC-STD-50-001 at the same time as FSC-STD- 40-004, and PEFC ST 2001:2008 at the same time as PEFC ST 2002:2010.</i></p>	
<p>To be completed by Certification Decision-Making Entity</p>	<p><b>SCS Certification Decision:</b> Include the applicable standards, number and type of CARs, and any conditions or pre-conditions associated with certification decision.</p>	<p>Senior Paper Corp. is in conformance with FSC-STD-40-004 v2-1. Initial certification is approved.</p>
	<p><b>Scope of certificate:</b></p>	<p>This certificate covers the production and distribution of paperboard products using the transfer system.</p>
	<p><b>Certification decision by:</b></p>	<p>Edward Dockray</p>
	<p><b>Date of decision:</b> For initial or continued certification</p>	<p>February 21, 2013</p>
	<p><b>Surveillance schedule:</b> Note any sites or requirements needing special attention at surveillance audits. If no FSC material is present at the time of the evaluation audit and at least one Major CAR is issued regarding a Critical Control Point, the first surveillance audit must occur within 3 months of the organization beginning processing of FSC material.</p>	
<p><b>Allowable size limit and annual growth rate:</b> For Group and Multi-site Certificates only</p>	<p>The organization may add up to            sites to the multi-site / group certificate before the next annual audit ( % growth), and the certificate can include a maximum of            sites (total) before the current certificate expiration date.* These numbers are subject to change at subsequent SCS audits.</p> <p><input type="checkbox"/> N/A, single certificate</p> <p>If additional certified locations, or expansion beyond above maximums, are desired please contact SCS.</p>	

## PART 1B: Conformance Summary

Evaluation and description of any critical control points with a risk that uncontrolled wood or fiber may enter the Chain of Custody system:

Critical Control Point	High Risk of Mixing	Low Risk of Mixing
Purchasing eligible material/product		X
Verifying reclaimed/controlled material	N/A	N/A
Receiving		X
Segregation		X
Processing		X
Determination of claims (transfer, percentage or credit system; physical separation or percentage method)		X
Outsourcing	X	
Trademark use		X
Sales and shipping documents		X
Other:		X

At the time of the audit, had the organization taken physical possession of FSC-certified material?

- Yes
- No, if there is a deemed risk that uncontrolled wood or fiber may enter the FSC Chain of Custody system an early surveillance site audit will be required
- N/A, this is a Surveillance or Re-evaluation audit
- N/A, not normal business practice to take physical possession of material/product
- N/A, not certified to FSC standards

Describe any high risks of mixing noted above, indicating which certification schemes are affected and the corresponding CAR or OBS:

Outsourcing is being used for paper conversion; Outsourcer is being site-audited as part of Senior Paper's FSC CoC Certification.

### Review of Corrective Action Requests:

Submit evidence with report where appropriate. Minor CARs not closed by the deadline must be elevated to Major CARs. Major CARs not closed by their stated deadline may result in suspension until conformance is confirmed.

#### Corrective Action Requests from previous audit:

- N/A, Evaluation or Expansion of Scope audit, or no prior CARs  
 See CAR/OBS Form from previous audit

#### Summary of identified nonconformances and opportunities for improvement:

Complete CAR/OBS form and submit with audit report. If one CAR is issued against multiple standards, count the CAR towards the primary standard reference only.

Standard	# Major CARs	# Minor CARs	# Observations
FSC-STD-40-004 Chain of Custody	0	0	0
FSC-STD-40-005 Controlled Wood			
FSC-STD-40-007 Reclaimed Material			
FSC-STD-40-003 Multi-site CoC Certification			
FSC-POL-40-002 Group CoC Certification			
FSC-STD-50-001 Trademark requirements	0	0	0
PEFC ST 2002:2010 Chain of Custody Requirements			
PEFC ST 2001:2008 PEFC Logo Usage			
Other:			

### PART 1C: Evaluation Summary

<p>Description of evaluation:</p>	<p>Please see the Audit Plan for a more detailed description of the Evaluation conducted. A general outline of the Audit follows:</p> <p><b>Pre-Audit:</b></p> <ul style="list-style-type: none"> <li>• Audit Plan was sent to Senior Paper</li> <li>• Tom Eisenmann Jr. and auditor communicated by phone and email prior to audit</li> <li>• Auditor evaluated Senior Paper’s procedures; changes and edits of the company’s procedures and documents were completed by Senior Paper prior to the site audit.</li> </ul> <p><b>Audit:</b></p> <ul style="list-style-type: none"> <li>• Opening Meeting – auditor met with Tom Eisenmann Jr., confirming Audit Plan and giving an overview of the standard and its requirements</li> <li>• Documents Review - Auditor reviewed FSC documents for all relevant standards.</li> <li>• Inspection and Interviews - Auditor conducted an audit to ensure conformance with FSC standards and Senior Paper’s own processes and procedures, interviewing</li> </ul>
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	<p>employees to verify training and understanding of FSC requirements.</p> <ul style="list-style-type: none"> <li>• Closing Meeting - Findings were discussed and questions answered</li> </ul> <p>Post- Audit:</p> <ul style="list-style-type: none"> <li>• Additional material was sent to the auditor after the audit to the auditor's satisfaction.</li> </ul>
Number of sites audited out of total number of sites in scope of certificate:	1 of 1 +Outsourcer Site Audit
Date(s) of evaluation:	February 5, 2013 (Desk) & February 12, 2013
Duration of evaluation (excluding report writing):	Audit was approximately 4 hours
Auditor name:	Erin Dwyer
Auditor qualifications (e.g., training, certifications, number of years auditing):	<p><i>Erin Dwyer is an Industrial Engineer with over 20 years' experience in Product Traceability, Product and System Certification, and Document Control Systems.</i></p> <p><i>Ms. Dwyer is a Certified Lead Auditor in FSC (since 2008) and other forest certification programs, as well as ISO 9000 (since 1995).</i></p> <p><i>Ms. Dwyer has conducted hundreds of audits for FSC, SFI, PEFC, ISO 9000, and manufacturing and services systems control, including virtual audits for the court as a legal Expert Witness.</i></p>

## Section 2: Organization Information

PART 2A: Certificate Scope	
Total number of sites included in the certificate scope: Excluding outsourcers	1 of 1 <input type="checkbox"/> <i>Changed since previous audit</i>
Standards used in assessment of the organization: Check all that apply, for any and all sites. See certification decision for standard version(s).	<input checked="" type="checkbox"/> FSC-STD-40-004 Chain of Custody (including FSC-STD-50-001) <input type="checkbox"/> FSC-STD-40-003 Multi-site Chain of Custody <input type="checkbox"/> FSC-STD-40-005 Company Evaluation of Controlled Wood <input type="checkbox"/> FSC-STD-40-007 Sourcing Reclaimed Material <input type="checkbox"/> FSC-POL-40-002 Group Chain of Custody <input type="checkbox"/> PEFC ST: 2002-2010 PEFC Chain of Custody (including ST: 2001-2008) <input type="checkbox"/> <i>Changed since previous audit</i>
The scope of this certificate includes the following: Check all that apply	<p><b>Forestry</b></p> <input type="checkbox"/> Forest Management Operation holding FSC FM/COC certificate
	<p><b>Manufacturing: (with retail, wholesale, or other processes)</b></p> <input type="checkbox"/> Primary – uses round wood (logs) as inputs or does pulp or paper milling <input type="checkbox"/> Secondary – all other manufacturers
	<p><b>Non-timber forest products (NTFPs)</b></p> <input type="checkbox"/> Organization collects or processes NTFPs
	<p><b>Trading <i>only</i>:</b></p> <input checked="" type="checkbox"/> Desk – trades in product without physical possession <input type="checkbox"/> Wholesale – distributes product with physical possession <input type="checkbox"/> Retail – sells to end-user with physical possession
Type of Facility (main site): e.g. Sawmill, Paper mill, Wholesaler, Distributor, Paper Converter, Printer, Cabinet Manufacturer, etc.	Broker
Type of data control system: e.g. manual, barcodes, computer automation, etc.	Senior Paper uses a combination of manual and computer systems for data control. Please see Section 2B for more detail.
Approximate number of employees for all certified sites: Full-time equivalent employees	3 <input type="checkbox"/> <i>Changed since previous audit</i>



<p>FSC Annual Accreditation Administration Fee (AAF) Class based on combined turnover of <u>all</u> sites included in certificate scope:</p>	<table border="0"> <tr><td><input type="checkbox"/></td><td>I:</td><td>&lt;\$200,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>II:</td><td>\$200,000 to \$1,000,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>III:</td><td>\$1,000,000 to \$5,000,000 USD</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>IV:</td><td>\$5,000,000 to \$25,000,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>V:</td><td>\$25,000,000 to \$100,000,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>VI:</td><td>\$100,000,000 to 500,000,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>VII:</td><td>500,000,000 to 1,000,000,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>VIII:</td><td>&gt;1,000,000,000 USD</td></tr> <tr><td><input type="checkbox"/></td><td>N/A</td><td>Not FSC certified</td></tr> </table> <p>Organization must disclose annual sales of all products containing wood fiber. This information is used for the purposes of calculating the AAF (Accreditation Administration Fee) for FSC. The information is treated as confidential.</p> <p><input type="checkbox"/> <i>Changed since previous audit</i></p>	<input type="checkbox"/>	I:	<\$200,000 USD	<input type="checkbox"/>	II:	\$200,000 to \$1,000,000 USD	<input type="checkbox"/>	III:	\$1,000,000 to \$5,000,000 USD	<input checked="" type="checkbox"/>	IV:	\$5,000,000 to \$25,000,000 USD	<input type="checkbox"/>	V:	\$25,000,000 to \$100,000,000 USD	<input type="checkbox"/>	VI:	\$100,000,000 to 500,000,000 USD	<input type="checkbox"/>	VII:	500,000,000 to 1,000,000,000 USD	<input type="checkbox"/>	VIII:	>1,000,000,000 USD	<input type="checkbox"/>	N/A	Not FSC certified
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<input type="checkbox"/>	N/A	Not FSC certified																										
<p>PEFC Annual Notification Fee</p>	<p>Annual turnover of organization: <i>(include currency)</i></p> <p>Notification fee is based on total turnover (not only wood or PEFC products) for all sites included in the scope of the certificate. Varies per country.</p> <p><input type="checkbox"/> N/A, not PEFC certified</p>																											
<p>Language(s) of certificate:</p>	<table border="0"> <tr> <td><input checked="" type="checkbox"/> English</td> <td><input type="checkbox"/> Dutch</td> <td><input type="checkbox"/> Portuguese</td> </tr> <tr> <td><input type="checkbox"/> German</td> <td><input type="checkbox"/> Spanish</td> <td><input type="checkbox"/> Other</td> </tr> </table>	<input checked="" type="checkbox"/> English	<input type="checkbox"/> Dutch	<input type="checkbox"/> Portuguese	<input type="checkbox"/> German	<input type="checkbox"/> Spanish	<input type="checkbox"/> Other																					
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<p>Has organization been FSC CoC certified previously?</p>	<table border="0"> <tr><td><input checked="" type="checkbox"/></td><td>Not previously FSC CoC certified</td></tr> <tr><td><input type="checkbox"/></td><td>Transfer from other CB:</td></tr> <tr><td><input type="checkbox"/></td><td>Previous SCS CoC client with lapse in certification</td></tr> <tr><td><input type="checkbox"/></td><td>New SCS CoC client with lapse in certification, previous CB:</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, existing SCS client</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, not FSC certified</td></tr> </table>	<input checked="" type="checkbox"/>	Not previously FSC CoC certified	<input type="checkbox"/>	Transfer from other CB:	<input type="checkbox"/>	Previous SCS CoC client with lapse in certification	<input type="checkbox"/>	New SCS CoC client with lapse in certification, previous CB:	<input type="checkbox"/>	N/A, existing SCS client	<input type="checkbox"/>	N/A, not FSC certified															
<input checked="" type="checkbox"/>	Not previously FSC CoC certified																											
<input type="checkbox"/>	Transfer from other CB:																											
<input type="checkbox"/>	Previous SCS CoC client with lapse in certification																											
<input type="checkbox"/>	New SCS CoC client with lapse in certification, previous CB:																											
<input type="checkbox"/>	N/A, existing SCS client																											
<input type="checkbox"/>	N/A, not FSC certified																											

PART 2B: Overview of Organization	
<p>General description of organization: its operations, products and function of the sites.</p>	<p>Senior Paper is a single-site broker of paperboard. Although Senior Paper takes no possession of product, it is sometimes processed on their behalf by K &amp; W Paper Depot Corp., an Outsourcer who converts the paperboard rolls into sheets.</p> <p>Senior Paper's major customers are printers of paperboard boxes. A small percentage of product (roughly 2%) is sold to die-cutters, who do not print on the product.</p>
<p>Description of the system by which the organization maintains control over the Chain of Custody for all products and certification schemes included in the organization's certified product</p>	<p>Senior Paper's FSC CoC system covers control and traceability of the FSC product through all relevant sections of FSC-STD-40-004, v.2.1, as detailed below:</p>

group list, covering:

- a) Quality management (CoC Administrator, number of staff involved, training program, etc.)
- b) Material sourcing
- c) Material receipt and segregation
- d) Volume control
- e) System for controlling claims
- f) Sales and delivery; and where applicable:
- g) Trademark use
- h) Outsourcing
- i) Minor components
- j) Controlled Wood or Reclaimed Material verification program(s), including Annex 3 where applicable
- k) Multi-site or Group management
- l) Special circumstances for other certification schemes

- a. Tom Eisenmann Jr. is in charge of Quality Management with respect to FSC products, and is directly responsible for most aspects of the FSC CoC program. Training is conducted as needed. But as Mr. Eisenmann handles most aspects of FSC, and there are only 3 total company employees, training does not really apply for this company.
- b. Mr. Eisenmann is responsible for material sourcing, and for verification of suppliers' FSC Certificates using [www.info.fsc.org](http://www.info.fsc.org).
- c. Material is not received at Senior Paper; material is sometimes received by K & W as an Outsourcer, where it is kept labeled and segregated throughout storage and conversion.
- d. Volumes are tracked manually using a log.
- e. Senior Paper is using the Transfer System to control FSC Claims
- f. Senior Paper does not use shipping documents, instead relying on their supplier's shipping documents, or using Senior Paper invoices as shipment documents for Outsourced product.
- g. Tom Eisenmann Jr. is responsible for getting FSC trademark use approval using the FSC and SCS online systems.
- h. Depending upon the product, any conversion is done at an Outsourcer, K & W, with whom Senior Paper has a signed Outsourcing Agreement.
- i. Minor Components are not used by Senior Paper.
- j. Controlled Wood and Reclaimed Material programs do not apply to Senior Paper.
- k. Multi-site and Group Management does not apply to Senior Paper.
- l. There are no special circumstances for other certification schemes.

Are there sites owned by the organization that are not included in the certificate scope?

No  Yes\*

\*Certificate shall not be used for material handled at uncertified locations.

Remarks:

Wood / fiber purchased and sold over previous 12 months

N/A, not FSC certified

For 1st evaluation, provide total wood/fiber purchased and sold; for all surveillance and re-evaluation audits, provide total FSC certified wood/fiber purchased and sold:

specify units: volume, dry weight, or number of pieces as appropriate

Approx. quantity purchased:	5,000 tons annually
Approx. quantity sold:	5,000 tons annually

FSC Product Group List for Organization (all sites). Data will be posted / updated on <http://info.fsc.org>.

- N/A, PEFC Product Group information collected on PEFC Reporting Form  
 N/A, not FSC certified

Complete this table exactly as provided by the organization or attach client's PGL. Check the box below if nonconformances are found.

- Nonconformance(s) identified regarding product group list

Product Description	Product Code FSC-STD-40-004a	Species of Material Inputs (Common + Latin name)	Material Category of Input	Control System	Material Category of Output	Sites involved
Coated Paperboard	P3.2	N/A	FSC Recycled FSC Mix	Transfer	FSC Recycled FSC Mix	Single Site

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**Part 2C: Outsourcing Processing of FSC Material**  N/A, does not use contractors for outsourced processing of certified product

Name of contractor	Contact information and address	CoC code, if certified	Outsourced activity	Organization's reason for outsourcing	Risk Indicator #* or N/A	Audited this year?	FSC	PEFC
K & W Paper Depot Corp	Wilson Ho 2023 Seaman Ave, South El Monte, CA 91733	N/A	Paper Conversion (Roll to Sheets)	Broker	1,5	Yes		


'Tab' in last box to add additional rows as necessary

#	* Indicators of high risk outsourcing (FSC only)
1.	The organization is outsourcing a wide range of production related activities
2.	The organization is outsourcing to a number of contractors on a regular basis
3.	The contractor grades or sorts the material during outsourced processing
4.	The contractors label the product during outsourced processing
5.	Contractors do not physically return the FSC-certified product following outsourced processing
6.	The organization is outsourcing processing across national borders
N/A	The outsourced processing is not included in one of the above indicators, or the organization is not FSC certified

**PART 2D: FSC Controlled Wood**

N/A, does not handle or process verified controlled material or FSC Controlled Wood

- Purchases FSC Controlled Wood from CW certified supplier(s)
- Purchases FSC CW, does not sell FSC CW (not certified to 40-005)
- Purchases and sells FSC CW Risk Assessments not necessary, issue CW code
- Implements a Controlled Wood verification program**
- Annex II Risk Assessments, does not sell FSC CW submit reviewed Risk Assessment(s)
- Annex II Risk Assessments, sells FSC CW submit reviewed Risk Assessment(s), issue CW code
- Annex III site audits, does not sell FSC CW submit reviewed RA(s) showing categories of 'unspecified risk'
- Annex III site audits, sells FSC CW submit RA(s) showing categories of 'unspecified risk', issue CW code

**Suppliers of Controlled Material**

Controlled material includes non-FSC certified material included in the organization's controlled wood verification program. Complete the chart below or submit a complete list with report.

Supplier name and address	Description of non-FSC certified wood / fiber received	Species received (Common and Latin names)	Approx. volume received

*'Tab' in last box to add additional rows as necessary*

**District(s) of Origin of non-certified wood included in organization's controlled wood verification program**

District of Origin (per Risk Assessment)	Sources of information	New	Updated	Approved	Annex 3?

*'Tab' in last box to add additional rows as necessary*

## PART 2E: Minor Components

<input checked="" type="checkbox"/>	N/A, does not use ineligible wood/fiber components in FSC products
<input type="checkbox"/>	N/A, not FSC certified

Expand as necessary to include all minor components used (or intended for use) in FSC products. For minor components between 1 and 5%, also submit new derogation application(s) from the client (one per minor component).

Common Trade Name of Component	Description of Component	Volume/weight of wood/fiber	% volume/ weight of total product wood/fiber	(N/A if <1%)Derogation expiration date	(N/A if <1%)Conditions of the derogation	(where applicable)Species	Dimensions	(FSC-STD-40-004a)FSC Product Group & Product Code	FSC label used (Y/N)?

*'Tab' in last box to add additional rows as necessary*

<b>Justification for minor components up to 1%:</b> Reason why material for the specified components could not be sourced from FSC-certified controlled or reclaimed sources.	
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## SECTION 3: Additional General Requirements

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By acknowledging and agreeing to the findings provided in this report, the Organization hereby agrees to notify Scientific Certification Systems of any of the following changes that could have a material impact on their continued certification:

- Fulfillment of Corrective Action Requests (CARs) / conditions
- Date of production start of certified products if initial audit was conducted during absence of certified material
- Change in organization/company name
- Change in ownership and/or management
- Change in contact name(s) and address(es)
- Change to the scope of the certificate, as it appears on the certificate or FSC / PEFC database
- Addition of new facility(ies) and/or termination of facility(ies) covered by the certificate
- Circumstances and/or resource conditions that could materially impact the continued validity of the certification
- Addition / removal of Product Groups
- Material changes to existing Product Groups, such as commencement of new accounting systems or modification of product claims
- New use of the SCS and/or FSC or other certification scheme Trademarks
- Incident report of incorrect claim or deviation from certification scheme regulations
- Trademark misuse by suppliers
- New outsourcing agreements
- Agreements with vendors or other certificate holders for on-product labeling using certificate code
- Material change to documented control system
- Termination of certification scheme business in whole or in part
- Any other circumstances where the product may no longer comply with the requirements of the certification system

## SECTION 4: Standard Conversions

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1 mbf	2.36 m3
423.7 bf	1 m3
1 cord	2.55 m3
1 inch	2.54 cm
1 foot	0.3048 m
1 square foot	0.0929 m2
cubic foot	0.028317 m3

1 yard	0.9144 m
1 gallon (US)	3.78541 liters
1 pound	0.4536 kg
1 US ton	907.185 kg
1 UK ton	1016.047 kg
1 acre	0.405 hectares
1 mile	1.60934 km





**Appendix: Required Supporting Documentation** *(CW suppliers, outsourcers, product group list, if not listed in report above)*