

## Does Superior Hardwoods of Ohio meet FSC's Controlled Wood standard?

December 4, 2025

We are carrying out an audit of Superior Hardwoods of Ohio located in McArthur, Ohio to see if their operations comply with FSC's [Controlled Wood](#) standard (FSC-STD-40-005 V3-1). We are writing to you to ask if you know of any reason why their operations would not meet this standard.

Controlled Wood is wood that meets minimum requirements and that can therefore be mixed with FSC wood and used in products with an FSC Mix label. In particular, the wood must not be:

- harvested illegally.
- harvested in violation of traditional and civil rights.
- harvested from forests with a high conservation value that is threatened by management activities.
- harvested from forests being converted to plantations or non-forest use.
- from forests in which genetically modified trees are planted.

We will carry out our audit on January 15, 2026. Here is how you should comment, if you wish to do so:

- When? You should send comments to us before or during the audit.
- How? You can comment by:
  - Meeting with a Preferred by Nature staff member in person.
  - Phone to Johnathan Evers at 216-536-6470
  - Preferred by Nature staff member from the US Regional Office. Their phone numbers are +1-802-434-3420
  - Writing to Johnathan Evers at 13 Jolina Court-Second Floor, P.O. Box 99, Richmond, VT
  - Email to Johnathan Evers at [jeverson@preferredbynature.org](mailto:jeverson@preferredbynature.org)
  - In person by arranging to meet with Johnathan Evers
- If you want your comments to be confidential please notify us when you submit the comments.

If you provide comments, we will provide feedback to you within 30 days of the audit.

Superior Hardwoods of Ohio has written a summary document that lists:

- the risks they have identified that they may source unacceptable wood
- the measures they implement to mitigate those risks.

We have attached this summary document to this letter.

If you wish to dispute any aspect of this forest certification process or the decision we reach as to whether this company meets the Controlled Wood standard, you can access our Dispute Resolution Policy at <https://www.preferredbynature.org/node/9284>.

Thank you for any help you are able to provide.

If you have any recommendations for contacting other stakeholders that may have an interest in providing comments on this company and audit, we would also gladly receive these from you.

Yours sincerely,

Johnathan Evers

# FSC Controlled Wood Due Diligence System Public Summary

*Note: Guidance on how to use this document is in grey italic font and should be deleted from the final version*

## 1. General information

<b>Organisation name:</b>	Superior Hardwoods of Ohio, Inc.
<b>FSC certificate code:</b>	RA-CW-004824
<b>Organisation's DDS contact person:</b>	Bryan Feicht
<b>DDS prepared/assisted by:</b>	Bryan Feicht/Doug Schwemlein
<b>Date last reviewed/updated (by the organisation):</b>	5/27/2025

## 2. Suppliers

Participating site	Non-certified material type sourced	Exact number of suppliers	Supplier type(s)	Average no. of tiers in the supply chains	Approximate or exact number of sub-suppliers
McArthur	Logs	45	Loggers	1	0
Wellston	Logs	25	Loggers	1	0
Cambridge	Logs	48	Loggers	1	0
Parkersburg	Logs	47	Loggers	1	0
Barlow	Logs	29	Loggers	1	0

### 3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
<p><i>The description should allow the identification of an area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category. This is a geographic description (including country of origin) and may also include a functional scale/source type, where the risk assessment differentiates risk based on characteristics such as type of forest (e.g. natural forest or plantation), ownership (e.g. state or private-owned), etc.</i></p>		<p><i>If an NRA or CNRA is used, include the document title on FSC Document Centre. E.g. the title for the CNRA for Poland is "FSC-CNRA-PL V1-1" (see <a href="https://ic.fsc.org/en/document-center/id/238">https://ic.fsc.org/en/document-center/id/238</a>).</i></p> <p><i>If a company risk assessment or extended company risk assessment is used, write this and refer to the Annex containing the risk assessment.</i></p>	<p><i>Select the relevant risk designation for the supply area and controlled wood category from the drop-down menu.</i></p>
<p><b>Ohio, Northern West Virginia, South-eastern Pennsylvania, Northern Kentucky</b></p>	1	US NRA	Low risk
	2	US NRA	Low risk
	3	US NRA	Specified risk
	4	US NRA	Low risk
	5	US NRA	Low risk

#### 4. Risk assessment and mitigation

SH has implemented the US National Risk Assessment, FSC-NRA-USA V1-0, that was approved on April 1st, 2019, to determine the risk related to sourcing material from each controlled wood category.

##### 4.a Risk mitigation for the origin of the material

Copy the table for each supply area. Add information about control measures for each indicator that is designated **specified or unspecified risk** in the relevant risk assessment (**deleting rows for indicators that are low risk or aren't found in the applicable risk assessment**) and complete the table.

If you only source from low risk areas, delete the table and state **"N/A, all supply areas are low risk"**.

Supply area: Ohio, Northern West Virginia, South-eastern Pennsylvania, Northern Kentucky		
Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Number of the indicators designated specified or unspecified risk in the applicable risk assessment. Note that the number of applicable indicators will change depending on the type of risk assessment used, and not all will be applicable to company risk assessments and 'old' national risk assessments.	Describe the control measures implemented to mitigate the risk and describe their desired outcome. Describe the activities conducted to verify the effectiveness of the control measures. Include information on the cycle (how often you conduct verification), number of audits, justification of sampling intensity, and the key results of the audits. If you found non-conformities, state steps taken to address them.	Summarise findings, if field verification was conducted. Describe steps taken to address any non-conformities found, unless confidential. If information is deemed confidential and not published, provide a justification for this.
Controlled wood category 1. Illegally harvested wood <b>N/A, all supply areas are low risk</b>		
Controlled wood category 2. Wood harvested in violation of traditional and human rights <b>N/A, all supply areas are low risk</b>		
Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities <sup>2.1</sup>	<ul style="list-style-type: none"> <li>Based on the 2024 risk assessment analysis, we have identified 33 counties where there is potential for sourcing logs from Mesophytic Cove Sites.</li> <li>The list of counties will be supplied to each log buyer at all mill sites.</li> <li>If logs come into a facility from one of the counties on the list, then that job will be flagged as needed to have a mandatory field inspection.</li> <li>The field inspection will be conducted by a trained SH forester to verify whether or not the site contains a MCS.</li> <li>If site is found to contain a MCS, SH forester will encourage the supplier to abide by the harvest recommendations provided in the "Identification and Timber Management of Mesophytic Cove Sites for FSC Controlled Wood" publication from the University of Kentucky. (I.E. removing no more than 25% of the dominant overstory trees with at least 80% of the harvested trees being Yellow-Poplar or</li> </ul>	

	<p>Cucumber trees). If harvest is found to be in compliance with harvest recommendations the logs will be included in controlled wood sourcing. If the harvest is not in compliance, then the logs will be omitted from controlled wood volume.</p> <ul style="list-style-type: none"> <li>Field inspections will include an audit form complete with GPS coordinates and details of the inspection, and records kept for 5 years.</li> </ul> <p>Late Successional Bottomland Hardwoods and Central Appalachians CBA exist in a few counties in Kentucky. In order to verify that we weren't sourcing material from any of these counties we ran a report in our Fiber Tract Software and determined that we had only sourced wood from Greenup, Mason, Lawrence, and Carter County, KY. None of these counties are at risk of Late Successional Bottomland Hardwoods or Central Appalachians CBA. In 2023 we created a MCS map showing risk assessment areas within our wood basket.</p>	
3.1 2.2	CENTRAL THEME: Education & Outreach	
3.22.3	CENTRAL THEME: Education & Outreach	
3.3 2.4	CENTRAL THEME: Education & Outreach	
3.42.5		
3.5	Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities	
3.63.1		
Controlled wood category 4. Wood from forests being converted to plantations or non-forest use3.2 <b>N/A, all supply areas are low risk</b>		
Controlled wood category 5. Wood from forests in which genetically modified trees are planted3.41.11 <b>N/A, all supply areas are low risk</b>		

#### 4.b Risk assessment and mitigation for mixing in the supply chain

Participating site	Supply chain type	No. of tiers	Risk of mixing	Control measures	Findings from field verification if undertaken as a control measure
<i>This table shall be filled for each applicable participating site (listed in the table in Section 2)</i>	<p>Describe the supply chain e.g.</p> <ul style="list-style-type: none"> <li>Wood delivered and purchased directly from concession holder to Organisation's log yard</li> <li>Wood delivered and purchased directly from concession holder to Organisation's log yard, but purchased through a round wood trader.</li> </ul>	<i>'Tiers' indicates the legal entities taking ownership of the wood from harvesting to the organisation purchasing it. If there is only 1 tier, it means that wood is purchased</i>	<i>Summarise the risk assessment of mixing in this supply chain. Justify conclusions. NOTE: As per requirement 3.5 of FSC-STD-40-005 V3-1, material can only be used as controlled wood when there is low risk for origin and NO RISK of mixing with non-eligible inputs in the supply chains.</i>	<i>If risk is identified, state what actions are being taken to mitigate that risk. Describe the activities that have been conducted by the organisation to verify the effectiveness of the control measures. Include information on the cycle (how often verification is conducted), number of audits, justification of sampling intensity, and the key results of the</i>	<i>Summarise findings, if field verification was conducted. Describe steps taken to address any non-conformities found, unless confidential. If information is deemed confidential and not published, provide a justification for this.</i>

	<ul style="list-style-type: none"> <li>Wood delivered from forest to railway terminal and transported by train to organisation. and state the relevant supply area, or state that the material previously had an FSC claim but was sourced from a non-FSC certified (chain of custody) supply chain.</li> </ul>	directly from the concession holder.	Therefore, conclusions shall be either "no risk" or that risk is present. Control measures are required for instances where risk is present.	audits. If non-conformities were found, state steps taken to address them.	
McArthur	Logs are delivered directly from the forest.	1-2	Logs are delivered direct from forest. No risk of mixing.	CM Audits are conducted annually to verify district of origin compliance.	N/A
Wellston	Logs are delivered directly from the forest.	1-2	Logs are delivered direct from forest. No risk of mixing.	CM Audits are conducted annually to verify district of origin compliance.	N/A
Cambridge	Logs are delivered directly from the forest.	1-2	Logs are delivered direct from forest. No risk of mixing.	CM Audits are conducted annually to verify district of origin compliance.	N/A
Parkersburg	Logs are delivered directly from the forest.	1-2	Logs are delivered direct from forest. No risk of mixing.	CM Audits are conducted annually to verify district of origin compliance.	N/A
Barlow	Logs are delivered directly from the forest.	1-2	Logs are delivered direct from forest. No risk of mixing.	CM Audits are conducted annually to verify district of origin compliance.	N/A

## 5. Technical experts used in the development of control measures

List all technical experts used for developing control measures.

Name	License/Registration #	Qualification	Scope of service	Source of information
			State the relevant supply area(s) and indicator(s) for which expertise was used in the development of control measures	For publicly available expertise, provide the citation for the specific source(s) of information used
FSC US			Appalachian region	FSC US Controlled Wood Regional Meeting Report, Appalachian Region: Asheville, NC July 19, 2018
Ohio Div. of Forestry		State Government Authority	State of Ohio, BMPs	<a href="http://forestry.ohiodnr.gov/portals/forestry/pdfs/industry/bmplogging.pdf">http://forestry.ohiodnr.gov/portals/forestry/pdfs/industry/bmplogging.pdf</a>
Ohio Div. of Forestry		State Government Authority	State of Ohio, Invasive Species	<a href="http://ohiodnr.gov/invasivespecies">http://ohiodnr.gov/invasivespecies</a>
UK Center for Forest and Wood Certification		University	Forests of HCV and Mesophytic Cove Sites	<a href="https://cfwc.ca.uky.edu/controlled-wood">https://cfwc.ca.uky.edu/controlled-wood</a>

## 6. Stakeholder consultation processes

Summarise all stakeholder consultation processes that you have conducted, including information on:

***N/A, stakeholder consultation not required***

Supply area	Relevant controlled wood category	List of stakeholder groups invited to participate	Summary of comments received from stakeholders	Description of how stakeholder comments were taken into account	Justification for concluding that the material sourced from the area was low risk
		<i>List all types of stakeholders contacted. E.g. Forest owners/managers, Forest contractors, Representatives of forest workers and forest industries, FSC certificate holders, Local/regional/national/international social NGOs, Forest workers, trade unions, local communities, indigenous and traditional peoples, local/regional/national/international environmental NGOs, FSC-accredited certification bodies, National and state forest agencies, Experts with expertise in controlled wood categories, Research institutions and universities, FSC regional offices/network partners/working groups</i>			

## 7. Complaints

Complaints must be received in writing and must include the name and contact information of the complainant, a description of the issue and supporting evidence.

Complaints will be submitted to the Superior Hardwoods FSC Certification Manager: Bryan Feicht, PO Box 320, McArthur, OH 45651, [bfeicht@shlumber.com](mailto:bfeicht@shlumber.com), 740-596-2561.

- Complaints Procedure:
  - a) Acknowledge receipt of complaint.
  - b) Inform stakeholders of the complaint procedure and provide an initial response within two weeks.
  - c) Forward complaints related to risk designation to the certifying body.
  - d) Conduct an initial determination of whether or not the complaint is “substantial” by assessing the evidence provided against the risk of using material from unacceptable sources.
  - e) Have discussion with complainant that aims to resolve complaints initially designated as substantial before proceeding to further actions.
  - f) Forward substantial complaints to the certifying body and relevant FSC National Office for the supply area within two weeks of receiving the complaint. This must include information on what steps will be taken to resolve the issue and the precautionary approach that will be used.

- g) Implement a precautionary approach towards the continued sourcing of relevant material while the complaint is pending. (Pending complaints are those complaints assessed as substantial and where no corrective actions have yet been taken).
- h) Implement a verification process for a complaint determined to be substantial, within two months of receipt (e.g. field verification, desk verification).
- i) Determine corrective actions to be taken by suppliers and the means to enforce their implementation for complaints assessed and verified as substantial. If corrective actions cannot be determined and/or enforced, the relevant material and/or suppliers will be excluded by Superior Hardwoods.
- j) Verify that corrective actions have been taken by suppliers and whether or not they are effective.
- k) If no corrective actions have been taken, the relevant material and/or suppliers will be excluded by Superior Hardwoods.
- l) Inform the complainant, the certification body, and the relevant FSA National Office of the results of the complaint and any actions that were taken.
- m) Keep records of all complaints received, actions taken, and all associated correspondence and retain records for a minimum of 5 years.

## **Annex**

### ***US National Risk Assessment.***