Chain of Custody for Certified Wood products within LEED Canada

FAQ: As the final distributor or final fabricator of Forest Stewardship Council (FSC) Certified Wood, does my company need to be Chain-Of-Custody (COC) certified to be able to sell certified wood for LEED projects in Canada?

In LEED Canada, the requirement for Certified Wood is to provide a set percentage, by cost, of wood-based products and materials certified in accordance with the Forest Stewardship Council’s (FSC) standards. FSC requires that all companies providing wood-based products are FSC chain-of-custody (COC) certified to ensure the integrity and accuracy of the FSC claims that accompany the material through the supply chain.

For the achievement of the Certified Wood credit, the US Green Building Council (USGBC) and the Canada Green Building Council (CaGBC) have in the past allowed a party to claim credit for the use of FSC-certified wood in a project even if the party involved in final fabrication of the product before it reaches the building is not COC certified. In an effort to align FSC rules and LEED requirements, the USGBC approved revised guidance language on Certified Wood in April 2008 for all US LEED Rating Systems, and which became immediately applicable to all LEED projects.

The CaGBC is incorporating the same revised language as the USGBC within each new LEED rating system it releases. That is, rating systems launched in 2009 or later require that the permanently-installed FSC-certified wood-based products be purchased and invoiced from a vendor that is FSC COC certified. Vendors are defined as those companies that sell products to the project contractor or subcontractors. Each vendor invoice must conform to the following requirements:

a) Each wood product must be identified on a line-item basis;
b) FSC products must be identified as such on a line-item basis;
c) The dollar value of each line item must be shown;
d) The vendor’s Chain of Custody (COC) certificate number must be shown on any invoice that includes FSC products.

This means that each wood product’s vendor that invoices FSC certified products must be FSC COC certified by an FSC accredited certifier.

LEED Canada for Homes, launched in March 2009, was the first LEED Canada rating system for which this revised language was applied. To date, the other rating systems to which the revised language apply are: LEED Canada for Existing Buildings: Operations and Maintenance 2009; LEED Canada for New Construction and Major Renovations 2009; and LEED Canada for Core and Shell 2009.

In May 2015, Credit Interpretation Request (CIR) 1191 was released. It clarifies that entities that install an FSC-certified product on the project building/site (typically project contractors or subcontractors, but also furniture installers and the like), are not required to have FSC CoC certification as long as they do not modify the product’s packaging or form except as is required for installation. In all other instances, FSC CoC certification is required. The CIR also cautions that contractors and sub-contractors who temporarily possess FSC-certified material prior to installation must not mix or "contaminate" the FSC-certified material with non-FSC-certified material.

In addition to this new guidance from CIR 1191, it should be noted that failure to ensure that wood-based products are purchased from an FSC COC certified vendor on previously registered projects (i.e. under earlier versions of the rating systems) may result in failure to meet LEED requirements. For instance, some projects registered under LEED Canada-NC 1.0 may later choose to transfer to LEED Canada NC 2009, effectively changing the eligibility requirements for the Certified Wood credit. Project teams should also recognize that Canadian projects registered with the USGBC are already required to adhere to the revised language regarding FSC COC certification requirements.
The CaGBC encourages all Canadian manufacturers and distributors to achieve FSC COC certification to ensure they remain competitive on LEED projects in both the Canadian and American markets.

Additional links and resources:

- Please first check the Reference Guide for the rating system applicable to your project. If you do not own the appropriate Reference Guide, consider purchasing one through [www.cagbc.org](http://www.cagbc.org).
- USGBC Memorandum on “Revised Requirements for Documenting the Use of FSC Certified Wood in LEED”, April 7, 2008.
- To verify that a vendor is FSC-certified, please visit the FSC International database and enter the vendor’s name or unique FSC certification code: [www.fsc-info.org](http://www.fsc-info.org). For more information on FSC certification visit [www.fsccanada.org](http://www.fsccanada.org) (for Canada) or [www.fscus.org](http://www.fscus.org) (for U.S.).

Wood based products are those made from the fibrous material found in the trunks or limbs of trees and that typically originate in forests or plantations. Wood-based products include solid wood products, chip and fibre products, and engineered wood products. Examples of products that would be eligible for the Certified Wood credit include, but are not limited to: logs, lumber, timbers, millwork, glulam, trusses, mouldings, veneers, plywood, Oriented Strand Board (OSB), particleboard, Medium Density Fibreboard (MDF), paneling/siding, flooring (engineered, hardwood), decking, formwork, fire/pressure treated products, casework and furniture (if permanently installed).